

Metalico Aluminum Recovery, Inc.
Facility No. 7102372
6223 Thompson Road
Syracuse, New York 13206

Oil Pollution Prevention
Spill Prevention Control
and
Countermeasure Plan (SPCC)

and

Best Management Practices (BMP) Plan

January 2009

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Prepared For:

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Syracuse, New York 13206

Prepared By:

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I. Combined Plan Introduction and Program Development

The Federal Clean Water Act (CWA) provides that stormwater discharges associated with industrial activity from any point source to any water of the United States is unlawful unless authorized by a National Pollutant Discharge Elimination System (NPDES) permit. In New York State, NPDES permitting and enforcement is administered by the State through a federally-approved program known as the State Pollution Discharge Elimination System (SPDES). Industrial/commercial facilities determined to be subject to SPDES regulations must obtain a permit from the New York State Department of Environmental Conservation (NYSDEC) prior to discharge. In order to receive coverage under a SPDES permit, facilities are required to develop and implement a plan which ensures that water quality within the regulated area of the facility will be preserved and maintained.

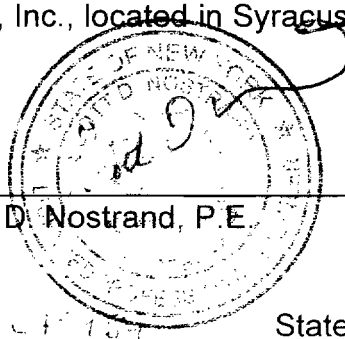
In addition to addressing stormwater pollution prevention planning considerations, this Plan fulfills the requirements of the USEPA's Oil Pollution Prevention regulations (40 CFR Part 112) which requires the preparation of a SPCC Plan. MARI has chosen to combine the BMP and SPCC plans due to the operational and regulatory overlap of these State and Federal programs. This planning approach optimizes MARI's implementation of the facility's pollution prevention efforts by reducing the burden of maintaining and implementing multiple programs of a similar nature.

This combined Spill Prevention Control and Countermeasures (SPCC) plan and Best Management Practices (BMP) plan has been developed specifically for the Metalico Aluminum Recovery, Inc. (MARI) scrap metal processing facility located in the Town of DeWitt, Onondaga County, New York (see Figure 1). This Plan is intended to satisfy one of the special conditions of the facility's State Pollution Discharge Elimination System (SPDES) Permit #NY026-1947 which was issued on April 4, 2007. A copy of the facility's current SPDES Discharge Permit is maintained in Appendix X.

II. Professional Engineer's Opinion (40 CFR 112.3(d))

The undersigned Registered Professional Engineer attests that he is familiar with the requirements of Part 112 of Title 40 of the Code of Federal Regulations (40 CFR Part 112), and has supervised the examination of the Metalico Aluminum Recovery, Inc. Syracuse, New York facility (Facility No. 7102372) by appropriately qualified Barton and Loguidice, P.C. (BandL), personnel on June 18, 2008. Based on the information available at the time of the site examination, and to the best of Engineer's knowledge and belief, this Spill Prevention Control and Countermeasure Plan (SPCC) has been prepared in accordance with the standard and care typical of good engineering practices, including consideration of applicable industry standards, to meet or exceed the minimum provisions required by 40 CFR Part 112. Procedures for required testing, inspections and spill response have been established such that the plan is adequate for the facility. As a condition of this engineer's provision, the facility's management has approved this plan and is committed to providing appropriate oversight, resources, staff, equipment and training to implement it fully.

This statement in no way relieves the owner or operator of the facility of his/her duty to prepare, update and fully implement this SPCC Plan in accordance with the applicable requirements of 40 CFR Part 112. This plan is valid only to the extent that the facility owner or operator maintains, tests, and inspects equipment, containment, and other devices as prescribed in this plan. This document has been prepared for the exclusive use of Metalico Aluminum Recovery, Inc., located in Syracuse, New York.



Scott D. Nostrand, P.E.

Date: 6/20/08 Registration No. 1206.001 State: NY

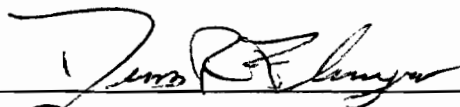
III. Management Commitment (40 CFR 112.7)

This SPCC Plan has been prepared in accordance with good engineering practices and the minimum applicable plan requirements of 40 CFR Part 112. The Metalico Aluminum Recovery, Inc. management is fully committed to implementing this plan as described herein in order to prevent accidental discharges of oil to the environment.

SPCC Plans are required to address the accidental discharge of oils that could adversely impact the environment and "Waters of the United States". SPCC Plans address the control measures to be initiated in order to prevent spills of oil, and the countermeasures to be activated in the event of a spill.

To this end, this plan has the full approval of the Metalico Aluminum Recovery, Inc. management, and the facility is committed to making all required expenditures of management oversight, resources, staff, equipment, and training necessary to be effective in this regard. Furthermore, the management is committed to addressing and correcting the action items summarized in the Implementation Plan (see Section III) and described more fully in subsequent sections of the plan, within the established time frames. The undersigned is the facility's designated person accountable for oil spill prevention at the facility and has the authority to commit the resources and personnel necessary to implement this SPCC Plan.

Signature:



Name:

DENNIS FLANAGAN

Title:

G.M.

Date:

1-21-09

IV. Implementation Plan (40 CFR Part 112.7)

This Implementation Plan (IP) sets a schedule for maintenance related, programmatic, and/or administrative tasks to be implemented in order to reduce the potential for releases or spills at the facility. The items outlined in the following table were identified during the site inspection conducted by BandL on June 18, 2008. The site inspection included a review of petroleum bulk storage and handling areas, facility drainage, and loading/unloading procedures utilized at the site. The inspection also included discussions with facility personnel about operational practices with respect to the storage and handling of oil. The site was also reviewed for compliance with New York State petroleum bulk storage regulations.

The Implementation Plan tasks were developed based on operations and practices observed at the facility during the time of the inspection, as well as information provided by Metalico Aluminum Recovery, Inc.

In accordance with 40 CFR 112.7, the Implementation Plan schedule will be completed in the time allotted and under the direction and supervision of the Metalico Aluminum Recovery, Inc. management. The required tasks to be completed as part of the Implementation Plan are detailed in the following table:

Implementation Plan				
Description	Location	IP Task	Schedule	Completion Date and Signature
Tank 101 (Off-Road Diesel Fuel)	Outside, Fueling Area	1) Re-label tank to match PBS registration certificate numbering in compliance with NYSDEC regulations. 2) Color code tank fill port per NYSDEC regulations for high-sulfur diesel fuel (see Appendix V). 3) Correct tank labels to indicate "Off-Road High-Sulfur Diesel Fuel". 4) Add tank specific level to volume conversion chart at tank gauge location to accurately determine volume of product in tank. 5) Manually inspect the interstitial monitoring port monthly to check for leaks and document on monthly tank inspection log.	Within 30 days	
Tank 102 (Off-Road Diesel Fuel)	Outside, Fueling Area	6) Re-label tank to match PBS registration certificate numbering in compliance with NYSDEC regulations. 7) Color code tank fill port per NYSDEC regulations for high-sulfur diesel fuel (see Appendix V). 8) Correct tank labels to indicate "Off-Road High-Sulfur Diesel Fuel". 9) Properly maintain tank gauge and replace if necessary to allow accurate readings. 10) Manually inspect the interstitial monitoring port monthly to check for leaks and document on monthly tank inspection log.	Within 30 days	
Tank 103 (Off-Road Diesel Fuel) Portable Skid Tank	Storage Bin No. 7 Varies - Portable Tank	11) Color code tank fill port for high-sulfur diesel fuel (see Appendix V). 12) Label tank with: SPCC ID Number, product stored "Off-Road High-Sulfur Diesel Fuel", "design capacity = 300 gallons", and "working capacity = 255 gallons". 13) Add a tank gauge to accurately determine volume of product in tank.	Within 30 days	
Tank 104 (Used Oil)	Storage Bin No. 7	14) Color code tank fill port per NYSDEC regulations for used oil (see Appendix V). 15) Label tank with: Tank ID Number, product stored "Used Oil", "design capacity = 325 gallons", and "working capacity = 276 gallons". 16) Add a tank gauge to accurately determine volume of product in tank.	Within 30 days	

Implementation Plan				
Description	Location	IP Task	Schedule	Completion Date and Signature
Tank AD-1 (Used Oil)	Storage Bin No. 7 (Auto Dismantler)	17) Color code tank fill/removal port per NYSDEC regulations for used oil (see Appendix V). 18) Label tank with: Tank ID Number, product stored "Used Oil", "design capacity = 180 gallons", and "working capacity = 153 gallons".	Within 30 days	
Tank AD-2 (Used Oil)	Storage Bin No. 7 (Auto Dismantler)	19) Color code tank fill/removal port per NYSDEC regulations for used oil (see Appendix V). 20) Label tank with: Tank ID Number, product stored "Used Oil", "design capacity = 180 gallons", and "working capacity = 153 gallons".	Within 30 days	
Tank AD-3 (Used Gasoline)	Storage Bin No. 7 (Auto Dismantler)	21) Color code tank fill/removal port per NYSDEC regulations for used gasoline (see Appendix V). 22) Label tank with: Tank ID Number, product stored "Waste Gasoline", "design capacity = 180 gallons", and "working capacity = 153 gallons".	Within 30 days	
Tank AD-4 (Used Antifreeze)	Storage Bin No. 7 (Auto Dismantler)	23) Label tank with: Tank ID Number, product stored "Used Antifreeze", "design capacity = 180 gallons", and "working capacity = 153 gallons".	Within 30 days	
Spill Contingency Plan	Transformers OFT-1 and 2; and OFT-16, 17 and 18	24) Implement Spill Contingency Plan weekly inspections.	Within 30 days	
Transformer Inspection Results	All transformers	25) Include records of transformer inspections (by SD Meyers) in Appendix W.	Within 30 days	
Label SPDES Permit Outfalls	Outfall 001 and 002	26) Label outfall locations as described in page 11 of the SPDES Permit	Within 30 days	
Tank Maintenance (Protective Coating)	Tanks 101, 102, 104	27) Tanks are only primer coated. Clean and remove corrosion from tank and associated piping and provide new protective coating in accordance with 6 NYCRR Part 614.9 (c).	April 2009	
Tank 103 (Off-Road Diesel Fuel) Portable Skid Tank	Storage Bin No. 7 Varies - Portable Tank	28) Provide tank with appropriate fire and safety signage (see Appendix V for guidance). 29) Add a normally closed tank vent. 30) Install a tank gauge. 31) Install a fill port spill bucket with lockable cover. 32) Cleanup residual fuel and staining from outside of tank.	April 2009	
Tank 104 (Used Oil)	Storage Bin No. 7	33) Add a normally closed tank vent. 34) Install a fill port spill bucket with lockable cover. 35) Install a direct read tank gauge.	April 2009	

Implementation Plan				
Description	Location	IP Task	Schedule	Completion Date and Signature
Drum Storage D-1	Maintenance Area (Main Bldg)	36) Minimize drum use and dispose of unused drums. 37) Inspect drums and pumps for leaks. Discontinue use of drums that show signs of corrosion or are leaking. 38) Label all oil drums with contents stored or as empty. 39) Label all drums used for purposes other than oil storage with intended use (i.e. "Garbage"). 40) Clean areas of residual staining on floor from minor spills of oil, and dispose of in accordance with local, state and federal regulations.	April 2009	
Drum Storage D-2	Aluminum Shredder (Main Bldg)	41) Minimize drum use and dispose of unused drums. 42) Inspect drums and pumps for leaks. Discontinue use of drums that show signs of corrosion or are leaking. 43) Label all oil drums with contents stored or as empty. 44) Label all drums used for purposes other than oil storage with intended use (i.e. "Garbage"). 45) Clean areas of residual staining on floor from minor spills of oil, and dispose of in accordance with local, state and federal regulations.	April 2009	
Drum Storage D-3	Storage Bin No. 7	46) Minimize drum use and dispose of unused drums. 47) Inspect drums for leaks. Discontinue use of drums that show signs of corrosion or are leaking. 48) Label all oil drums with contents stored or as empty. 49) Label all drums used for purposes other than oil storage with intended use (e.g. "Garbage"). 50) Clean areas of residual staining on floor from minor spills of oil, and dispose of in accordance with local, state and federal regulations.	April 2009	
Empty Drum Storage	Exterior Empty Drum Staging Area	51) Provide a sign at the empty drum staging area stating: "Empty Drum Staging Area", "Empty Drums Only", and "Do Not Fill".	April 2009	
All Transformers	All Electrical Transformers	52) Label each transformer reservoir with: SPCC ID number, product stored (e.g. "Dielectric Mineral Oil"), and design capacity (ex. "Design Capacity = 200 Gallons"). See Appendix E for design capacity listings for each.	April 2009	

Implementation Plan				
Description	Location	IP Task	Schedule	Completion Date and Signature
Spill Kits	Fleet Fueling Area, Storage Bin No. 7 (Auto Dismantler), Maintenance Area (Main Bldg), Blockhouse (Main Bldg), Pump House at CAMU, Main Substation, Non-ferrous Receiving, Loading Docks (2 kits), Chip Storage Area, Scrap Processing	53) Review spill kit locations and add spill kits as necessary at all oil storage locations in accordance with Section 6.5. Suggested locations are shown on Figure 2, required contents are listed in Appendix L.	April 2009	
Housekeeping	Entire facility	54) Clean up any residual minor residual oil and spent sorbent materials from all tanks and oil storage areas. Dispose of in accordance with applicable regulations.	April 2009	
Drum Storage (D-1)	Maintenance Area (Main Bldg)	55) Install secondary containment for drums providing 110% containment (minimum 61 gallons), with drum spill pallets or other means of containment. 56) Add a calculation of secondary containment structure capacity to Appendix I once constructed.	July 2009	
Drum Storage (D-2)	Blockhouse (Aluminum Shredder Area of Main Bldg)	57) Install secondary containment for drums providing 110% containment (minimum 61 gallons), with drum spill pallets or other means of containment. 58) Add a calculation of secondary containment structure capacity to Appendix I once constructed.	July 2009	
Transfer Containment Practices – Facility Drainage Controls	Tanks 101 and 102 Fuel Transfer Area – At Exterior Fueling Station	59) Construct a spill diversion/ retention structure or structures to provide a physical barrier providing time to respond to and contain accidental spills during tank filling operations before they reach the "Waters of the US". Diversionary structure must contain "most probable" spill and precipitation freeboard. The most probable spill is estimated to be 350 gallons. 60) Add a calculation of designed transfer secondary containment structure capacity to Appendix I once constructed.	July 2009	
Facility Drainage Controls – Secondary Containment	Drainage Area DA-1	61) Install proposed oil/water separator or other drainage control device designed to capture and retain oil to the site until cleanup can occur. Structure must be designed, installed, and maintained to capture largest probable spill from oil storage within drainage area DA-1 (Currently 303 gallons from OFT-3). 62) Update SPCC plan once the oil water separator is installed.	July 2009	

Implementation Plan				
Description	Location	IP Task	Schedule	Completion Date and Signature
Security	All oil storage areas outside of existing fenced area	63) Lock the fill ports on all exterior tanks. 64) Review exterior lighting to ensure areas are provided with security lighting during non-business hours. Remote areas may be fitted with motion activated lighting.	July 2009	

V. SPCC Plan Key Action Items

The following is a summary of key action items described in this SPCC Plan. These items must be performed and addressed by the facility in order to comply with SPCC rules and regulations. These items include:

1. Complete the required Implementation Plan Tasks described in Section III within the time allotted.
2. Complete monthly site inspections and other testing that may be required as outlined in the Inspections and Record Keeping section of the plan (Section 7.0 and 12.1). Complete Monthly SPCC and PBS Inspection Log provided in Appendix J and NYSDEC PBS Regulation Compliance Checklist provided in Appendix U.
3. Perform preventative maintenance of equipment, storage containers, secondary containment systems, and discharge prevention systems described in the plan.
4. Conduct annual employee training as outlined in the Employee Training section of the plan (Section 8.0), and document them on the log provided in Appendix R.
5. Respond to all spills promptly in accordance with Section 4.0 (Spill Response Procedures).
6. Notify appropriate local, State, and Federal agencies following an oil spill in accordance with the Spill Notification Plan (Section 5.0) of the plan.
7. Review the plan on an annual basis (see Section 11.1).

8. Amend the SPCC Plan within six (6) months whenever there is a change in facility design, construction, operation, or maintenance that materially affects the facility's spill potential (see Section 11.2).
9. Update the plan whenever there are non-technical change amendments required (see Section 11.3)
10. Review the plan at least once every five (5) years and amend it to include more effective prevention and control technologies to improve spill prevention capabilities (see Section 11.4). Five-year review certification in Appendix T must be completed.

1.0 Introduction and Compliance with 40 CFR 112 (40 CFR 112.7(a)(2))

This document has been prepared by Barton and Loguidice, P.C. (B&L) for Metalico Aluminum Recovery, Inc. (MARI) to meet the minimum requirements set forth in the U.S. Environmental Protection Agency's (EPA's) Oil Pollution Prevention regulation 40 CFR Part 112, requiring the preparation of a facility Spill Prevention, Control and Countermeasure (SPCC) Plan (herein referred to as "plan", or "SPCC Plan"). This regulation applies to any facility with a cumulative oil storage capacity of 1,320 gallons or greater that stores and/or uses oil, which in the event of a release, could be reasonably expected to discharge oil in harmful quantities into the "Navigable Waters of the United States". Any storage vessel with a capacity of 55 gallons or greater must be included in the aggregate storage capacity for each facility.

Based on the facility's bulk oil storage capacity (>1,320 gallons), the facility is subject to the spill prevention requirements under Federal Regulation 40 CFR Part 112. This Spill Prevention, Control, and Countermeasure Plan has been prepared based on a site visit, discussions with personnel, and a review of existing site information and reports. A description of the facility's bulk oil storage is presented in Section 2.5 – Facility Petroleum Bulk Storage.

The facility does not meet the Criteria for Substantial Harm as defined by 40 CFR 112. The Certification of the Applicability to Substantial Harm Criteria is provided in Appendix A of this plan.

1.1 Cross-Reference with SPCC Regulatory Provisions (40 CFR 112.7)

As permitted by the regulation, this plan does not follow the exact order of 40 CFR Part 112. Sections headings are supplemented with applicable regulatory citations where appropriate.

This plan has been supplemented with a regulatory citation cross-reference table, Table 1-1, summarizing the location of the regulatory requirements listed in 40 CFR 112, and the equivalent requirements located in this plan.

Table 1-1. SPCC Regulatory Citation Cross-Reference	
SPCC Regulatory Citation	Associated SPCC Plan Section(s)
112.3(d) – <i>Professional Engineer Certification</i>	Section II. Professional Engineer's Opinion
112.3(e) – <i>Location of SPCC Plan</i>	Section 1.2 Location of SPCC Plan
112.5(a) – <i>SPCC Plan Amendment by Owners or Operators</i>	Section 11.0 Review and Evaluation of Plan
112.5(b) – <i>SPCC Plan 5-Year Review by Owners or Operators</i>	Section 11.0 Review and Evaluation of Plan
112.7 – <i>Additional Methods, Equipment or Procedures Required</i>	Section IV. Implementation Plan
112.7 – <i>Management Approval</i>	Section III. Management Commitment
112.7 – <i>Regulatory Cross-Reference Table</i>	Table 1-1 SPCC Regulatory Citation Cross-Reference
112.7(a)(2) – <i>Compliance with Requirements</i>	Section 1.0 Introduction And Compliance with 40 CFR 112
112.7(a)(3) – <i>Plant Information and Physical Layout</i>	Section 2.0 Facility Information Figure 1 Site Location Map and Figure 2 SPCC/BMP Site Plan
112.7(a)(3)(i) – <i>Type of Oil Stored</i>	Section 2.5 Facility Petroleum Bulk Storage Table 2-1 Facility Oil Storage
112.7(a)(3)(ii) – <i>Discharge Prevention Measures for Routine Handling</i>	Section 6.1 Facility Drainage Controls Section 10.0 Oil Transfer Operations
112.7(a)(3)(iii) – <i>Discharge/Drainage Controls</i>	Section 6.1 Facility Drainage Controls Section 6.2 Secondary Containment – Bulk Storage Containers
112.7(a)(3)(iv) – <i>Countermeasures</i>	Section 4.0 Spill Response Procedures Figure 3 Spill Response Decision Tree
112.7(a)(3)(v) – <i>Disposal Methods</i>	Section 4.3 Emergency Spill Contractors Section 4.4 Waste Disposal
112.7(a)(3)(vi) – <i>Contact List and Phone Numbers</i>	Section 5.0 Spill Notification Plan Appendix B Facility Contacts
112.7(a)(4) – <i>Discharge Notification Information</i>	Section 5.0 Spill Notification Plan
112.7(a)(5) – <i>Discharge Response Procedures</i>	Section 4.0 Spill Response Procedures Figure 3 Spill Response Decision Tree
112.7(b) – <i>Reasonable Spill Potential Analysis</i>	Section 3.0 Spill Prediction, Volumes, Rates and Controls
112.7(c) – <i>Containment and/or Diversionary Equipment</i>	Section 6.0 Preventative Measures Provided
112.7(d) – <i>Measures Not Practicable</i>	Not applicable to this facility
112.7(e) – <i>Inspection, Tests and Records</i>	Section 7.0 Inspections, Testing, and Record Keeping
112.7(f) – <i>Personnel, Training and Discharge Prevention Procedures</i>	Section 8.0 Employee Training
112.7(g) – <i>Security</i>	Section 9.0 Security

Table 1-1. SPCC Regulatory Citation Cross-Reference	
SPCC Regulatory Citation	Associated SPCC Plan Section(s)
112.7(h) – Facility Tank Car and Tank Truck Loading/Unloading Rack	Not applicable to this facility
112.7(i) – Field Constructed Aboveground Containers	Not applicable to this facility
112.7(j) – Conformance with Other Requirements	Section 12.0 Conformance
112.7(k) – Qualified Oil-Filled Operational Equipment	Section 2.5.4 Oil-Filled Equipment Section 13.0 Spill Contingency Plan
112.8(b) – Facility Drainage	Section 6.1 Facility Drainage Controls Section 6.3 Drainage of Diked Areas and Effluent Treatment Facilities
112.8(c)(1) – Compatibility of Container with Stored Product	Section 2.5.1 Construction
112.8(c)(2) – Secondary Containment	Section 6.2 Secondary Containment – Bulk Storage Containers Section 13.0 Spill Contingency Plan
112.8(c)(3) – Drainage of Secondary Containment	Section 6.3 Drainage of Diked Areas and Effluent Treatment Facilities
112.8(c)(4) – Completely Buried Tank Protection	Not applicable to this facility
112.8(c)(5) – Partially Buried Tanks	Not applicable to this facility
112.8(c)(6) – Inspection and Testing	Section 7.0 Inspections, Testing, and Record Keeping Appendix J Monthly Inspection Logs
112.8(c)(7) – Heating Coils	Not applicable to this facility
112.8(c)(8) – Overfill Prevention Systems	Section 6.4 Overfill Prevention System
112.8(c)(9) – Effluent Treatment Facilities	Section 6.3 Drainage of Diked Areas and Effluent Treatment Facilities
112.8(c)(10) – Removal of Discharges in Diked Areas	Section 6.3 Drainage of Diked Areas and Effluent Treatment Facilities Appendix K Records of Containment Dike Drainage
112.8(c)(11) – Mobile and Portable Containers	Section 2.5.3 Portable/ Mobile Storage Tanks and Drums
112.8(d) – Facility Transfer Operations and Processes	Section 6.8 Piping Appendix J Monthly Inspection Logs
112.20 – Certification of Substantial Harm Criteria	Appendix A Applicability of Substantial Harm Criteria

Note: This cross-reference table is based solely on the provisions of 40 CFR Part 112 that are applicable to this particular facility at the time of the site inspection. For a complete listing of SPCC Plan requirements, consult the full text of 40 CFR Part 112.

1.2 Location of SPCC Plan (40 CFR 112.3(e))

A complete copy of this SPCC Plan is maintained onsite in the Emergency Coordinator's office and MARI Office Manager's office. All employees are trained to know the location of the Plan, and the Plan is accessible to employees during facility operating hours in case of a spill emergency.

2.0 Facility Information (40 CFR 112.7(a)(3))

2.1 Facility Name and Location

The MARI Facility (herein referred to as the "site" or "facility") is located in the Town of DeWitt in Onondaga County, New York (see Figure 1 – Site Location Map). The facility is accessible from Thompson Road.

Facility Address and Telephone:

Metalico Aluminum Recovery, Inc.
6223 Thompson Road
Syracuse, New York 13206
(315) 463-9500
Contact: Denis R. Flanagan, General Manager

2.2 Facility Owner/Operator

The facility is owned and operated by MARI. The main offices are located at the following addresses:

Owner/Operator Address:

Metalico Aluminum Recovery, Inc.
6223 Thompson Road
Syracuse, New York 13206
Phone: (315) 463-9500
Contact: Dennis R. Flanagan, General Manager

2.3 Facility Contacts

The facility personnel responsible for overseeing the implementation of this SPCC Plan are listed in Appendix B. This list must be modified as necessary to maintain up-to-date personnel contact names, titles, and telephone numbers.

2.4 Facility Description

2.4.1 *Facility Operations*

In general, operations at the MARI Facility are typical of a scrap metal processing and recycling facility. The facility specializes in the recycling of ferrous and non-ferrous metals. The facility receives, sorts, stores, and processes (shearing, bailing, torching, etc.) various scrap metals. MARI also operates an aluminum smelter for secondary aluminum smelting and shipping. The scrap processing portion of the facility is normally staffed during the hours of 8:00 a.m. to 5:00 p.m., Monday through Friday, and 8:00 a.m. to 12:00 p.m. on Saturday. The aluminum smelting portion of the facility is typically in operation 24 hours a day 7 days a week. When the facility is not active, security personnel remain onsite 24 hours a day 7 days a week.

The facility's petroleum bulk storage tanks are registered with NYSDEC as PBS No. 7-437999. Petroleum operations at the facility involve fueling and maintaining the fleet of equipment utilized to process the scrap metal. In addition, four (4) underground collection tanks are utilized in support of the smelting operations to capture water and cutting oils that drain from aluminum chips. The facility stores oil in aboveground storage tanks (ASTs), portable ASTs, portable storage drums, and underground storage tanks (USTs) used for cutting oil and water drainage collection. The facility also maintains several pieces of oil-filled operational equipment.

2.4.2 Site Description

The MARI scrap metal processing facility is situated on a 22.4 acre parcel located in a commercial/industrial area of the Town of DeWitt in Onondaga County, New York (see Figure 1). The site is bordered to the south by a utility right-of-way (National Grid) and railroad tracks owned by Consolidated Rail (ConRail) Corporation, to the east by additional ConRail Corp. railroad tracks and other commercial/industrial properties beyond, to the north by Cyroland Corporation (a gas storage and distribution facility), and commercial/industrial properties owned by John and Susan Schneid and G and R Properties, LLC. to the west. MARI is accessible from Thompson Road. The general facility layout, oil storage areas, and drainage pathways are described below and shown on Figure 2.

The MARI site is currently improved with two primary structures, including a 110,000 \pm square foot main building and a 5,000 \pm square foot storage building (see Figure 2). The site also includes developed areas for site and facility access, vehicle parking, equipment fueling and storage/processing of scrap metal. A limited amount of undeveloped scrub vegetation covered area is located at the north end of the site. A large paved area associated with the on-site Corrective Action Management Unit (CAMU) is located centrally on-site, and covers approximately four acres. The main building houses an office area, maintenance area, scrap receiving area, scrap storage areas, and the aluminum processing area.

The site is divided into 3 main drainage areas. The surface topography in drainage area 1 (DA-1) is generally to the west to a drainage swale and then north. DA-2 and DA-3 generally slope east to

the onsite drainage system and then north. Stormwater is collected in onsite stormwater drainage system that ultimately discharges north of the site into Ley Creek. Further discussion of the facility drainage is provided in Section 2.6.

2.4.3 Spill History

Pursuant to 40 CFR 112.4, discharges of more than 1,000 gallons of oil in a single discharge, or the discharge of 42 gallons of oil in each of two (2) discharges within one 12-month period require the submission of information related to the discharge to the EPA Administrator within 60 days. See Section 5.2 for more information on EPA notification of discharge events. Appendix C summarizes petroleum releases that have occurred at the facility within the past five years.

There have been no reportable spills at the MARI facility since MARI commenced operations during April 2006. Historic issues related to soil and groundwater PCB contamination are documented in NYSDEC Division of Water and Division of Solid and Hazardous Materials records. Monitoring performed under the current SPDES Permit measures PCB concentrations in the outfall discharges related to historic on-site activities.

2.5 Facility Petroleum Bulk Storage (40 CFR 112.7(a)(3)(i))

The location of the facility's oil storage is shown on Figure 2. Oil storage included in the facility oil storage capacity calculation and regulated by SPCC rules is summarized in Table 2-1 below. The facility also maintains four underground storage tanks (USTs) used for secondary containment associated with trench drains that collect runoff from various locations at the site. The USTs

primarily store captured stormwater mixed with various cutting oils or other fluids that drain from the scrap metal storage areas. A description of each petroleum bulk storage container regulated by SPCC rules for the facility is also provided.

2.5.1 Construction (40 CFR 112.8(c)(1))

All aboveground petroleum bulk storage tanks, drums and transformers in use at the facility are constructed of steel. The materials and construction of tanks, drums, and transformers are compatible with the product they store and with the pressure and temperature storage conditions.

Table 2-1. Facility Oil Storage						
Tank ID	Oil Storage Description	Type	Capacity (Gallons)	Contents	Containment Description and Spill Equipment	Location
Bulk Storage Tanks						
101	AST	AST (single-wall steel in covered secondary containment; hopper-style)	1,000	"Off-Road" Diesel Fuel	Double wall hopper style tank provides secondary containment for 110% of the primary tank volume. A spill kit is located at the fuel dispensing area.	Fleet Fueling Area Near Facility Entrance
102	AST	AST (single-wall steel in covered secondary containment; hopper-style)	2,000	"Off-Road" Diesel Fuel	Double wall hopper style tank provides secondary containment for 110% of the primary tank volume. A spill kit is located at the fuel dispensing area.	Fleet Fueling Area Near Facility Entrance
104	AST	AST (single wall steel, horizontal)	300	Used Oil	Concrete floor and trench drains connected to a 1,000 gallon underground holding tank provide secondary containment for Storage Bin No. 7. Per the IP, a spill kit is to be located in Storage Bin No. 7.	Storage Bin No. 7
AD-1	AST	AST (single wall steel, horizontal) Auto Dismantler	180	Used Oil	Steel secondary containment basin provides containment for 110% of the primary tank volume. Concrete floor and trench drains connected to a 1,000 gallon underground holding tank provide secondary containment for Storage Bin No. 7. Per the IP, a spill kit is to be located in Storage Bin No. 7.	Storage Bin No. 7
AD-2	AST	AST (single wall steel, horizontal) Auto Dismantler	180	Used Oil	Steel secondary containment basin provides containment for 110% of the primary tank volume. Concrete floor and trench drains connected to a 1,000 gallon underground holding tank provide secondary containment for Storage Bin No. 7. Per the IP, a spill kit is to be located in Storage Bin No. 7.	Storage Bin No. 7

Table 2-1. Facility Oil Storage						
Tank ID	Oil Storage Description	Type	Capacity (Gallons)	Contents	Containment Description and Spill Equipment	Location
AD-3	AST	AST (single wall steel, horizontal) Auto Dismantler	180	Used Oil (Used Gasoline)	Steel secondary containment basin provides containment for 110% of the primary tank volume. Concrete floor and trench drains connected to a 1,000 gallon underground holding tank provide secondary containment for Storage Bin No. 7. Per the IP, a spill kit is to be located in Storage Bin No. 7.	Storage Bin No. 7
Portable Storage Tanks and Drums						
103	AST	AST (single wall steel, horizontal, non-stationary)	250	"Off-Road" Diesel Fuel	Concrete floor and trench drains connected to a 1,000 gallon underground holding tank provide secondary containment for Storage Bin No. 7. Per the IP, a spill kit is to be located in Storage Bin No. 7.	Storage Bin No. 7
D-1	Misc. 55-gallon drums	Steel drums	55 each (up to 6)	New Grease, Gear Oil, Hydraulic Oil, and Empty Drums	Per the IP, the facility is constructing a secondary containment spill pallet that will store drums in D-1 and be capable of containing at least 61 gallons of oil. Per IP, a spill kit is to be located in D-1.	Main Building Maintenance Area
D-2	Misc. 55-gallon drums	Steel drums	55 each (up to 2)	Used Oil	The drum is located inside the building on the concrete floor. Per the IP, the drum is to be stored on a secondary containment spill pallet or other secondary containment capable of containing at least 61 gallons of oil. Per IP, a spill kit is to be located at D-2.	Main Building Near Aluminum Shredder
D-3	Misc. 55-gallon drums	Steel drums	55 each (up to 6)	Various Oils and Empty Drums	Concrete floor and trench drains connected to a 1,000 gallon underground holding tank provide secondary containment for Storage Bin No. 7. Per the IP, a spill kit is to be located in Storage Bin No. 7.	Storage Bin No. 7
Oil Filled Transformers						
OFT-1	Transformer	Steel Reservoir	674	Electrical Cooling Oil	Per the IP, alternate secondary containment is provided by a Spill contingency Plan (see Section 13.0). Per the IP, a spill kit is to be located at the main substation.	Main Substation, South of Main Bldg.

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Table 2-1. Facility Oil Storage						
Tank ID	Oil Storage Description	Type	Capacity (Gallons)	Contents	Containment Description and Spill Equipment	Location
OFT-2	Transformer	Steel Reservoir	564	Electrical Cooling Oil	Per the IP, alternate secondary containment is provided by a Spill contingency Plan (see Section 13.0). Per the IP, a spill kit is to be located at the main substation.	Main Substation, South of Main Bldg.
OFT-3	Transformer	Steel Reservoir	303	Electrical Cooling Oil	Per the IP, an oil water separator is to be installed prior to Outfall 001 to provide facility drainage control for drainage area (DA-1) and 110% secondary containment for the aluminum shredder area. Per the IP, a spill kit is to be located in the aluminum shredder area.	Blockhouse (Inside Main Bldg. Near Aluminum Shredder)
OFT-4,5,6	Transformer	Steel Reservoir	91 each	Electrical Cooling Oil	Per the IP, an oil water separator is to be installed prior to Outfall 001 to provide facility drainage control for drainage area (DA-1) and 110% secondary containment for these transformers. Per the IP, a spill kit is to be located at the Buell Baghouse transformer area	Buell Baghouse (West of Main Bldg.)
OFT-7,8,9	Transformer	Steel Reservoir	77 each	Electrical Cooling Oil	Per the IP, an oil water separator is to be installed prior to Outfall 001 to provide facility drainage control for drainage area (DA-1) and 110% secondary containment for these transformers. Per the IP, a spill kit is to be located at the dryer transformer area.	Dryer Pad (West Exterior Wall of Main Bldg.)
OFT-10,11,12	Transformer	Steel Reservoir	78 each	Electrical Cooling Oil	Per the IP, an oil water separator is to be installed prior to Outfall 001 to provide facility drainage control for drainage area (DA-1) and 110% secondary containment for these transformers. Per the IP, a spill kit is to be located at the dryer transformer area.	Dryer Pad (West Exterior Wall of Main Bldg.)
OFT-13,14,15	Transformer	Steel Reservoir	57 each	Electrical Cooling Oil	Per the IP, an oil water separator is to be installed prior to Outfall 001 to provide facility drainage control for drainage area (DA-1) and 110% secondary containment for these transformers. Per the IP, a spill kit is located at the dryer transformer area.	Door No. 20 (West Exterior Wall of Main Bldg.)

Table 2-1. Facility Oil Storage						
Tank ID	Oil Storage Description	Type	Capacity (Gallons)	Contents	Containment Description and Spill Equipment	Location
OFT-16,17,18	Transformer	Steel Reservoir	78 each	Electrical Cooling Oil	Per the IP, alternate secondary containment is provided by a Spill contingency Plan (see Section 13.0). Per the IP, a spill kit is to be located at the Metal Shed	Pump House Storage Shed (Outside of Metal Shed at the CAMU)

2.5.2 Fixed Bulk Storage Tanks

Tanks 101 and 102

Tank 101 is a 1,000-gallon off-road diesel fuel tank. Tank 102 is a 2,000 gallon off-road diesel fuel tank. Tanks 101 and 102 are located at the southeastern corner of the facility, just north of the access road to Thompson Road (see Figure 2). Each tank is constructed of single-wall steel, and is a hopper-style AST with an integral covered steel secondary containment basin that is capable of containing 110% of the tank volume. The secondary containment basin is installed on supports that elevate the bottom off of the underlying concrete pad. Both tanks are fitted with a top-mounted fill port within a lockable spill containment enclosure, tank gauge, normal atmospheric vent, and emergency vent. Fuel is dispensed from the tanks via aboveground carbon steel piping to a suction dispenser mounted adjacent to the tanks. The fuel dispenser is locked when not in use. Deliveries of diesel fuel are made from the paved area adjacent to the tanks.

The tanks are owned and operated by MARI. Both tanks were reported installed on July 16, 1998 and are registered with the NYSDEC. The facility PBS application and registration are maintained in Appendix D.

At the time of the site examination, several items were identified that require corrective actions in order to bring the facility into compliance with NYSDEC petroleum bulk storage (PBS) and

EPA SPCC regulations. Identified deficient items along with a corrective action schedule are detailed in the IP Plan (Section III).

Tank 104

Tank 104 is a 300-gallon, single-wall steel, horizontal AST mounted on skids that is used to store used oil. The tank is situated above the concrete floor with the skids resting on a steel rack within Storage Bin No. 7. The tank is fitted with a fill port. The facility operates the tank in a stationary position. The concrete floor drains to a trench drain system connected to a 1,000 gallon underground fluid recovery holding tank that captures all fluids from the storage bin, providing secondary containment. Transfers of oil to and from this tank occur from within Storage Bin No. 7.

The tank is owned and operated by MARI. The facility PBS application and registration certificate are maintained in Appendix D.

At the time of the site examination, several items were identified that require corrective actions in order to bring the facility into compliance with NYSDEC petroleum bulk storage (PBS) and EPA SPCC regulations. Identified deficient items along with a corrective action schedule are detailed in the IP Plan (Section III).

Tanks AD-1, AD-2, AD-3 (Auto Dismantler)

Tanks AD-1, AD-2 and AD-3 are all 180-gallon, single-wall steel, horizontal AST mounted on the auto dismantler machine rack that are used to capture and store used automotive fluids collected

from vehicles prior to crushing. Tanks AD-1 and AD-2 contain used engine oil and used transmission fluid respectively. Tank AD-3 is used to store used gasoline collected from automotive fuel tanks. Per NYSDEC, all three tanks are regulated as used oil. The tanks are situated above a steel grated catwalk floor that covers a 249-gallon catch pan that is connected to a 360-gallon containment tank beneath. The auto dismantler is situated above the concrete floor on skids within Storage Bin No. 7. Each tank is fitted with a funnel fill port and extension hose, tank gauge, vent, and oil removal quick connect piping. The dismantler is designed to pump fluids out of the tanks/reservoirs on the vehicle being dismantled using air pressure. The concrete floor of Storage Bin No. 7 slopes to a trench drain system connected to a 1,000 gallon underground fluid recovery holding tank that captures all fluids from the storage bin, providing secondary containment. Transfers of oil to and from each of these tanks occur from within Storage Bin No. 7.

The auto dismantler is equipped with a fourth tank (AD-4) which is not regulated by NYSDEC or EPA. Tank AD-4 is a 180-gallon, single-wall steel, horizontal AST mounted on the auto dismantler machine rack that is used to capture and store used antifreeze collected from vehicles prior to crushing. Although this tank is not regulated by NYSDEC or EPA, it must be labeled with the contents and design and working capacities, per the IP.

The tanks are owned and operated by MARI. The facility PBS application and registration certificate are maintained in Appendix D.

At the time of the site examination, several items were identified that require corrective actions in order to bring the facility into compliance with NYSDEC petroleum bulk storage (PBS) and EPA SPCC regulations. Identified deficient items along with a corrective action schedule are detailed in the IP Plan (Section III).

2.5.3 Portable/Mobile Storage Tanks and Drums

Tank 103

Tank 103 is a 250-gallon, single-wall steel, horizontal, portable skid type AST that is used to store and dispense off-road diesel fuel. The tank is mounted on skids that allow it to be picked up and moved via a forklift for various fueling activities around the site. The tank is situated above the concrete floor with the skids resting on a steel rack within Storage Bin No. 7. The concrete floor sloped to a trench drain system connected to a 1,000 gallon underground fluid recovery holding tank that captures all fluids from the storage bin, providing secondary containment. The tank is equipped with a loose fitting fill port and a tank mounted suction dispenser. The tank is utilized for re-fueling the heavy machinery in the scrap metal receiving area. When in use, the tank is filled from the fleet fueling dispenser associated with Tanks 101 and 102, and then moved to various locations for fueling equipment. When not in use, the tank is located in Storage Bin No. 7 on the west side of the main building.

The tank is owned and operated by MARI. Due to its non-stationary design and use, Tank 103 is not required to be registered with NYSDEC.

At the time of the site examination, several items were identified that require corrective actions in order to bring the facility into compliance with NYSDEC petroleum bulk storage (PBS) and EPA SPCC regulations. Identified deficient items along with a corrective action schedule are detailed in the IP Plan (Section III).

Drum Storage

The facility currently utilizes a varying inventory of up to fourteen (14) 55-gallon drums to store new lube oils, hydraulic oil, grease and used oil. The facility also stages empty drums for recycling which are not regulated. Drums currently in use are stored in three main drum storage areas.

Drum storage area D-1 is located in the maintenance area of the Main Building (see Figure 2). Up to six (6) drums containing new grease, new hydraulic oil, new gear oil, used oil, or empty drums are maintained in D-1. Per the IP, the facility is currently constructing a spill pallet (capable of containing at least 61 gallons of oil) that will contain all drums stored in D-1. Drum storage area D-2 is located near the aluminum shredder in the northeastern corner of the Main Building. Up to two (2) drums containing used oil used for lubricating the aluminum shredder are maintained in D-2. Per the IP, the facility will install a spill pallet (capable of containing at least 61 gallons of oil) that will contain all drums stored in D-2.

Additional drainage control is provided by a trench drain that captures all fluids that drain from the aluminum shredder area and transmits the fluid to the pump house that pumps the collected fluids to Outfall 001 (see Figure 2). Per the IP, a stormwater treatment device at Outfall 001 provides oil/water separation retaining any oil to the site. Drum storage area D-3 is located in Storage Bin No. 7. Up to six (6) drums, containing various new and used oils are maintained in D-3. Secondary containment for D-3 is provided by the concrete floor and trench drain system across the entrance to Storage Bin No. 7 that leads to an underground holding tank.

MARI maintains an empty drum staging area at the southwestern portion (see Figure 2). Per the IP, this area is to be clearly labeled for empty drums storage only. MARI also maintains numerous empty drums throughout the site that are used to capture aluminum turnings, garbage, and other materials resultant from the scrapping operations that are not used for oil storage. Per the IP, MARI will label these drums for the actual uses.

Best management practices for all drums storage areas include: empty drums that are awaiting shipment back to the oil supplier are labeled as "empty – DO NOT FILL" and stored in a separate area that is clearly labeled and designated for empty oil drum storage only; the use of drums is minimized as much as possible and any unnecessary drums are removed from the site; drums and any associated pumps are inspected for leaks monthly, and any leaking drums are replaced immediately; and all drums are inspected to verify that they are correctly labeled with contents

stored, drums with intended uses other than oil storage must be properly labeled (i.e., "Garbage", "Turnings", etc.).

At the time of the site examination, several items were identified that require corrective actions in order to bring the facility into compliance with NYSDEC petroleum bulk storage (PBS) and EPA SPCC regulations. Identified deficient items along with a corrective action schedule are detailed in the IP Plan (Section III).

2.5.4 Oil-Filled Equipment

In accordance with SPCC regulations, electrical transformers are considered "oil filled equipment" or "oil filled operational equipment", and must meet the general requirements of 40 CFR 112.7. In accordance with modifications to the EPA SPCC rule published December 26, 2006, and effective February 26, 2007, a spill contingency plan may be provided for oil-filled operational equipment which has no history of discharge as described in 40 CFR Part 112.1(b), in place of the general secondary containment requirements of 40 CFR Part 112.7. The Spill Contingency Plan for the site (see Section 13.0) provides a written commitment of work force, equipment, and materials, as well as establishes an inspection and monitoring program to detect equipment failure or oil discharges.

The electrical transformers at the site are classified as oil-filled operational equipment and are used in power distribution at the facility. Transformers covered by the Spill Contingency Plan are indicated in the respective descriptions. The facility currently maintains the following oil filled transformers (OFTs) that are subject to the SPCC requirements:

OFT-1 and 2

OFT-1 and OFT-2 are pad mounted electrical transformers located at the main substation at the southeast corner of the property as shown on Figure 2. The main substation is surrounded by chain link fence and the area around the transformers is gravel to promote stormwater drainage. OFT-1 is a 5,000 KVA transformer that contains 674 gallons of electrical cooling oil. OFT-2 is a 3,750 KVA transformer that contains 564 gallons of electrical cooling oil. OFT-1 and OFT-2 are provided alternate secondary containment by the Spill Contingency Plan (see Section 13.0). The transformers in the main substation are owned and operated by MARI.

OFT-3

OFT-3 is located in the Blockhouse, which is within the Main Building near the aluminum shredder, as shown on Figure 2. OFT-3 is situated on the concrete floor and is a 500 KVA transformer that contains 303 gallons of electrical cooling fluid and is owned and operated by MARI. Per the IP, secondary containment for OFT-3 is provided by the stormwater treatment structure to be installed at Outfall 001.

OFT-4, 5, and 6

OFT-4, 5, and 6 are pad mounted transformers located near the Buell Baghouse on the west side of the facility. Each transformer is a 333 KVA unit that contains 91 gallons of electrical cooling oil and is owned and operated by MARI. Per the IP,

secondary containment for OFT-4, 5, and 6 is provided by the stormwater treatment structure to be installed at Outfall 001.

OFT-7, 8, and 9

OFT-7, 8, and 9 are pad mounted transformers located at the dryer transformer area on the west side of the Main Building. Each transformer is a 250 KVA unit that contains 77 gallons of electrical cooling oil and is owned and operated by MARI. Per the IP, secondary containment for OFT-7, 8, and 9 is provided by the stormwater treatment structure to be installed at Outfall 001.

OFT-10, 11, and 12

OFT-10, 11, and 12 are inactive pad mounted transformers located at the dryer transformer area on the west side of the Main Building. Each transformer is a 167 KVA unit that contains 78 gallons of electrical cooling oil and is owned by MARI. Per the IP, secondary containment for OFT-10, 11, and 12 is provided by the stormwater treatment structure to be installed at Outfall 001.

OFT-13, 14, and 15

OFT-13, 14, and 15 are transformers located at the Door No. 20 transformer area on the west side of the Main Building. Each transformer is a 167 KVA unit that contains 57 gallons of electrical cooling oil and is owned and operated by MARI. Per the IP, secondary containment for OFT-13, 14, and 15 is provided by the stormwater treatment structure to be installed at Outfall 001.

OFT-16, 17, and 18

OFT-16, 17, and 18 are inactive pad mount type transformers located at the Pump House Storage Shed (the metal shed at the CAMU). The transformers are currently staged on wooden pallets on a concrete pad. Each transformer is a 167 KVA unit that contains 78 gallons of electrical cooling oil and is owned and operated by MARI. OFT-16, 17, and 18 are provided alternate secondary containment by the Spill Contingency Plan (see Section 13.0).

SD Meyers Transformer Consultants performed an inspection of all OFTs during the summer of 2008. The results of the transformer inspections are included in Appendix W.

At the time of the site examination, several items were identified that require corrective actions in order to bring the facility into compliance with EPA SPCC regulations. Identified deficient items along with a corrective action schedule are detailed in the IP Plan (Section III).

2.5.5 Facility Oil Storage Capacity

Based on the regulated volumes of oil storage vessels and drums inventoried in Table 2-1 and summarized in Appendix E, the facility has a **maximum estimated petroleum bulk storage capacity of 7,544 gallons**. The aggregate oil storage capacity of the facility does not include containers with storage capacities less than 55 gallons.

2.6 Drainage Pathways and Distance to Navigable Receiving Waters

This section identifies the facility's proximity to surface waters including but not limited to: bays, rivers, streams (perennial or intermittent), creeks, ditches, flood control channels, storm drains, and other waterways. This section also identifies the stormwater discharge locations. The locations of the petroleum bulk storage tanks, drum storage areas, the layout of the facility drainage, and stormwater outfalls are presented on Figure 2.

2.6.1 *Distance to Navigable Waters*

Drainage at the facility consists of three (3) distinct drainage areas as shown on Figure 2. All three drainage areas flow to drainage swales that flow north and outfall at one of two points associated with the State Pollutant Discharge Elimination System (SPDES) Discharge Permit; Outfall 001 located at the northwest corner of the property, and Outfall 002 located at the northeast corner of the property. Both outfalls discharge to swales either infiltrate during low flows, or flow into the South Branch of Ley Creek and ultimately Onondaga Lake during high flows. The South Branch of Ley Creek is located approximately 150 feet east of the northeast corner of the property and 500 feet east of the northwest corner of the property boundary.

2.6.2 Site Drainage Areas and Outfall Locations

Drainage Area No. 1 (DA-1)

DA-1 consists of the majority of the western portion of the property less the northern vegetated area of the site as shown on Figure 2. Roof runoff from portions of the Main Building, runoff from paved areas on the west side of the Main Building, runoff from the concrete paved scrap metal storage area, and runoff from portions of the asphalt paved CAMU area flows to DA-1. A pump station on the east side of DA-1 collects runoff from trench drains and then pumps the fluid to Outfall 001. All other runoff from DA-1 gravity flows to Outfall 001 through a series of catch basins and underground stormwater conveyance piping.

Industrial operations in DA-1 consist of two lime-injected baghouses, truck and equipment traffic, receiving of scrap metal, storage and sorting of scrap metal, storage of engines to be scrapped, transfer of aluminum turnings from the storage area to the screening hopper that feeds the aluminum smelter, and storage of flux for use in the smelting operations. Petroleum operations include aboveground petroleum bulk storage tank storage, oil-filled drum delivery, storage and usage, and oil filled operational equipment (transformer) usage. A 2,000-gallon fluid recovery UST provides limited oil/water separation of runoff that enters the trench drain system on the north side of the storage bins.

Pollutants in DA-1 that have the potential to impact stormwater include the following: miscellaneous petroleum oils from

on-site equipment, vehicular traffic, scrap metal delivered to the facility, electrical cooling oil from the OFTs, salt flux, cutting oil residuals from turnings, automotive fluids from automobile dismantling operations, baghouse fines, and lime (from baghouse).

DA-2

DA-2 consists of the majority of the eastern portion of the property, less the northern vegetated areas and a portion of the CAMU area as shown on Figure 2. Roof runoff from portions of the Main Building, runoff from paved areas on the south and east side of the Main Building, runoff from the Fleet Fueling Area and runoff from the scale area flows to DA-2. Water from an artesian well below the Main Building is piped into one of the drainage structures associated with DA-2. According to facility personnel, the artesian well continually flows throughout the year. Drainage from DA-2 either flows across paved areas and into a series of catch basins and underground stormwater conveyance pipes to Outfall 002, or directly from surface runoff of paved areas and limited grass covered areas to Outfall 002.

Industrial operations in DA-2 consist of truck and equipment traffic, scrap receiving, and ingot shipping. Petroleum operations include aboveground petroleum bulk storage and dispensing of diesel fuel, and oil-filled electrical transformer usage.

Pollutants in DA-2 that have the potential to impact stormwater include the following: miscellaneous petroleum oils from

on-site equipment, vehicular traffic, scrap metal delivered to the facility, diesel fuel, and electrical cooling oil from the OFTs.

DA-3

DA-3 consists of the northern vegetated area and a portion of the asphalt paved CAMU area as shown on Figure 2. Runoff from this area flows north as sheet flow towards the adjacent property to the north of the site. There is no SPDES outfall that is directly associated with DA-3; however, any industrial activity that occurs in DA-1 and DA-2 is representative of the minimal amount of activity that occurs in DA-3.

Industrial operations in DA-3 mainly consist of truck and equipment traffic.

Pollutants in DA-3 that have the potential to impact stormwater include the following: miscellaneous petroleum oils from on-site equipment and vehicular traffic.

3.0 Spill Prediction, Volumes, Rates and Controls (40 CFR 112.7(b))

This section discusses potential spill predictions including flow direction, rate of flow, and total quantity of oil that could be discharged from the facility as a result of a major failure. Major failures include: tank overflow, rupture, leakage, or mechanical failure. Table 3-1 shows the expected resultant discharge of oil following the potential events listed above.

Table 3-1. Discharge Volume and Flow Direction				
Potential Event	Maximum Potential Volume Released (gallons)	Maximum Discharge Rate	Direction of Flow	Containment Method
Bulk Storage Tanks (Tank 101 and 102) – Fleet Fueling Area				
Failure of Aboveground Tank - collapse, rupture	1,000 to 2,000	Gradual to instantaneous – dependent on the location and size of failure point	Steel secondary containment basin. Failure of basin would cause oil to flow north to Outfall 002.	Passive secondary containment with steel secondary containment basin. Active secondary containment with spill kits and heavy equipment response.
Tank overfill or transfer equipment failure	1 to 200	200 gal/ minute	Concrete slab and gravel area surrounding tanks. Spill would eventually reach onsite stormwater system and flow north to Outfall 002.	Passive secondary containment with fill port spill containment enclosure. Active secondary containment with spill kits and heavy equipment response. Per IP, transfer area drainage control structure to be installed.
Leaking pipe, valve or dispensing equipment failure	1,000 to 2,000	10 gal/minute	Concrete slab and gravel area surrounding tanks. Spill would eventually reach onsite stormwater system and flow north to Outfall 002.	Anti-siphon solenoid valve installed on suction piping. Active secondary containment with spill kits and heavy equipment response.
Bulk Storage Tank (Tank 104) – Storage Bin No. 7				
Failure of Aboveground Tank - collapse, rupture, puncture	300	Gradual to instantaneous – dependent on the location and size of failure point	Concrete floor sloped to trench drain at storage bin entrance, then to underground fluid recovery holding tank.	Passive secondary containment with trench drain and fluid recovery holding tank. Active secondary containment with spill kit response.

**Table 3-1.
Discharge Volume and Flow Direction**

Potential Event	Maximum Potential Volume Released (gallons)	Maximum Discharge Rate	Direction of Flow	Containment Method
Tank overfill	1 to 5	5 gal/ minute	Concrete floor sloped to trench drain at storage bin entrance, then to underground fluid recovery holding tank.	Passive secondary containment with trench drain and fluid recovery holding tank. Active secondary containment with spill kit response.
Bulk Storage Tanks (Tanks AD-1, AD-2 and AD-3) – Storage Bin No. 7				
Failure of Aboveground Tank - collapse, rupture, puncture	180	Gradual to instantaneous – dependent on the location and size of failure point	Steel containment basin of automobile dismantler rack; then concrete floor sloped to trench drain at storage bin entrance, then to underground fluid recovery holding tank.	Passive secondary containment with steel containment basin; and trench drains connected to fluid recovery holding tank. Active secondary containment with spill kit response.
Tank overfill; Transfer Spills	1 to 25	25 gal/ minute	Steel containment basin of automobile dismantler rack; then concrete floor sloped to trench drain at storage bin entrance, then to underground fluid recovery holding tank.	Passive secondary containment with steel containment basin; and trench drains connected to fluid recovery holding tank. Active secondary containment with spill kit response.
Portable Bulk Storage Tank (Tanks 103) – Location Varies				
Failure of Aboveground Tank - collapse, rupture, puncture	250	Gradual to instantaneous – dependent on the location and size of failure point	Varies depending on location of equipment to be serviced. See Figure 2 for flow path in relation to location of refueling. When stored in Storage Bin No. 7, concrete floor sloped to trench drain at storage bin entrance, then to underground fluid recovery holding tank.	Passive secondary containment with trench drain and fluid recovery holding tanks. Active secondary containment with spill kit response.

**Table 3-1.
Discharge Volume and Flow Direction**

Potential Event	Maximum Potential Volume Released (gallons)	Maximum Discharge Rate	Direction of Flow	Containment Method
Tank overflow or transfer equipment failure	1 to 10	10 gal/ minute	Concrete slab and gravel area surrounding tanks. Spill would eventually reach onsite stormwater system and flow north to Outfall 002.	Per IP, passive secondary containment with fill port spill containment enclosure. Active secondary containment with spill kits and heavy equipment response. Per IP, transfer area drainage control structure to be installed.
Tank Mounted Suction Dispenser Failure	10	10 gal/minute	Varies depending on location of equipment to be serviced. See Figure 2 for flow path in relation to location of refueling.	Passive secondary containment with trench drains and fluid recovery tanks. Per IP, Outfall 001 is to be fitted with an oil water separator or other stormwater treatment device designed to retain oil to the facility. Active secondary containment with spill kits and heavy equipment response.
Interior Drum Storage - Maintenance Area (D-1)				
Drum rupture	55	Gradual to instantaneous	Per IP, spill pallet.	Per IP, passive secondary containment with spill pallet. Active secondary containment with spill kit response.
Interior Drum Storage (D-2) – Blockhouse (Aluminum Shredder)				
Drum rupture	55	Gradual to instantaneous	Per IP, spill pallet.	Per IP, passive secondary containment with spill pallet. Active secondary containment with spill kit response.
Covered Drum Storage (D-3) – Storage Bin No. 7				
Drum rupture	55	Gradual to instantaneous	Concrete floor sloped to trench drain at storage bin entrance, then to underground fluid recovery holding tank.	Passive secondary containment with trench drain and fluid recovery holding tank. Active secondary containment with spill kit response.

**Table 3-1.
Discharge Volume and Flow Direction**

Potential Event	Maximum Potential Volume Released (gallons)	Maximum Discharge Rate	Direction of Flow	Containment Method
Exterior Transformers (OFT-1, 2, 16, 17, and 18) – Drainage Area 2				
Reservoir Rupture	78 to 674	Gradual to instantaneous	North and east across plant yard to stormwater drainage system flowing north ultimately discharging to Outfall 002.	Active secondary containment with spill kits and heavy equipment response. Alternative to secondary containment provided by Spill Contingency Plan detailed in Section 13.0.
Exterior Transformers (OFT-4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, and 15) – Drainage Area 1				
Reservoir Rupture	57 to 91	Gradual to instantaneous	North and west across plant yard to stormwater drainage system flowing north ultimately discharging to Outfall 001.	Per IP, Outfall 001 is to be fitted with an oil water separator or other stormwater treatment device designed to retain oil to the facility. Active secondary containment with spill kits and heavy equipment response.
Interior Transformer (OFT-3) – Blockhouse (Aluminum Shredder)				
Reservoir Rupture	303	Gradual to instantaneous	Concrete floor of Main Building; if out of building to trench drain at overhead door, then to pump station and Outfall 001.	Per IP, Outfall 001 is to be fitted with an oil water separator or other stormwater treatment device designed to retain oil to the facility. Active secondary containment with spill kit response.

4.0 Spill Response Procedures (40 CFR 112.7(a)(3)(iv) and 112.7(a)(5))

Upon discovery or occurrence of any petroleum spill or release, employees must notify the Emergency Coordinator (EC) or Alternate EC immediately. An Oil Spill Response Decision Tree is provided as Figure 3 for quick reference in the event of a spill and must be posted in all oil storage areas. Consult the product's MSDS sheet (Appendix F) if the source of the spill is known. Employees observing a spill or release must be prepared to report the following to the EC:

- Description of the spill
- Material spilled
- Location of spill
- Volume spilled
- Time of spill/discovery
- Environmental conditions
- Any immediately affected receptors (employees, bystanders, surface waters, etc.)

Potential petroleum spills can be classified as "minor" spills or "major" spills, and are dependent on the volume and characteristics of the product released.

4.1 Minor Spills - Generally 5 Gallons or Less

Spills of 5 gallons or less are generally considered to be minor spills. These spills are considered to pose no significant harm or threat to human health or safety and the environment.

To aid in determining whether the spill is minor or major, the following should be considered. These statements generally describe a minor spill scenario.

- Spill volume is small (less than 5 gallons);
- The spill is localized around the source (tank, piping, dispenser, etc.);
- The discharged product is not likely to reach drainage pathways or water bodies;
- The discharged product can be easily stopped and controlled by facility personnel;
- There is little risk to human health or safety;
- There is little risk of fire or explosion.

In the event of a minor spill or release, the following sequence of action is to be taken:

1. Assess the scene for hazards to ensure that it is safe. Determine if there are injuries that need immediate medical attention. Determine if there is a risk of fire or explosions. Contact emergency medical and fire departments first if the situation is an emergency by CALLING 9-1-1.
2. Identify the source of the spill. If known, attempt to contain spill and stop the discharge at its source (i.e., close valve, return drum to upright position, plug holes, etc.).
3. Attempt to contain spill to a localized area with spill kit materials.

4. Observe and document the spill and immediately report to the EC for spill response actions.
5. Under direction of the EC or Alternate EC, consult MSDS sheet for recommended spill response and any precautions, contain spill with spill kit materials, perform corrective actions if possible, and clean up spill.
6. EC must review the spill to determine if the spill is reportable as defined in Section 5.0. If the spill is reportable, the EC must report the spill within 2 hours of the spill incident or discovery of the spill as described in Section 5.0.
7. EC or designated responsible person must document the spill and actions taken as outlined in the recordkeeping section (see Section 6.10 and Appendix G).
8. Dispose of all recovered materials, spent spill containment equipment and contaminated materials in accordance with local, State and Federal regulations.
9. Immediately replace spill supplies consumed during incident and ensure that the cause of the spill or release has been identified and remedied.

4.2 Major Spills - Generally Greater Than 5 Gallons

A spill is considered a major spill when it is large enough that it cannot be adequately and safely cleaned up or controlled by facility personnel. The following statements generally describe a major spill scenario:

- Spill volume is 5 gallons or more;
- The spill migrates to areas beyond the immediate discharge location.
- The discharged product has reached, or has the potential to reach drainage pathways or water bodies;
- The spill cannot be contained by employees using spill kit materials, and requires additional control methods such as heavy equipment and emergency spill contractors;
- There is risk to human health or safety;
- There is risk of fire or explosion.

In the event of a major spill or release, the following sequence of action is to be taken:

1. Assess the scene for hazards to ensure that it is safe. Determine if there are injuries that need immediate medical attention. Determine if there is a risk of fire or explosions. Contact emergency medical and fire departments **first** if the situation is an emergency by CALLING 9-1-1.
2. Identify the source of the spill and attempt to contain spill and stop the discharge at its source (i.e. close valve, return drum to upright position, plug holes, etc.)
3. Attempt to contain spill to a localized area with spill kit materials.
4. Observe and document the spill and immediately report to the EC for spill response actions.
5. Under the direction of the EC or Alternate EC, consult MSDS sheet for recommended spill response and any precautions, attempt to

contain spill with spill kit materials, perform corrective actions if possible, and clean up spill if safe to do.

6. EC or designated responsible person must activate appropriate facility personnel that are tasked with operating heavy equipment during major spill events (if necessary). Contact Emergency Spill Contractor (listed in Appendix H) if spill is larger than facility staff can safely contain and clean up.
7. EC must report any reportable spills or discharges, as defined in Section 5.0, within 2 hours of the spill incident or discovery of the spill.
8. EC or designated responsible person must document the spill and actions taken as outlined in the recordkeeping section (see Section 6.10 and Appendix G).
9. Disposal of recovered materials and spill containment equipment and materials must be conducted in accordance with state and federal regulations.
10. Immediately replace spill supplies consumed during incident and ensure that the cause of the spill or release has been identified and remedied.
11. EC to conduct post spill meeting to determine if spill could have been prevented, what caused the spill, critique the spill response actions to improve spill response in the future, and incorporate lessons learned into annual spill prevention training.

4.3 Emergency Spill Contractors (40 CFR 112.7(a)(3)(iv))

In the event of a petroleum discharge, a directory of the Emergency Spill Contractor and remediation contractors available is presented in Appendix H. These contractors may supply emergency spill response (if necessary), control and containment assistance, and cleanup and disposal of petroleum and petroleum contaminated media. Emergency Spill Contractors available 24 hours per day, 7 days per week, are listed also in this appendix.

4.4 Waste Disposal (40 CFR 112.7(a)(3)(v))

Wastes generated as a result of discharge response and cleanup will be containerized in impervious bags, drums, buckets, or other NYSDEC approved containers as appropriate. The waste materials will be characterized for proper disposal at a permitted waste disposal facility. The EC will ensure that all oil contaminated wastes are disposed of as required by local, State and Federal regulations. Emergency spill contractors are available to assist in waste disposal as necessary.

5.0 Spill Notification Plan (40 CFR 112.7(a)(3)(vi) and 40 112.7(a)(4))

Upon discovery or occurrence of any petroleum spill or release, employees **must** notify the Emergency Coordinator (EC) or Alternate EC immediately. Employees observing a spill or release must be prepared to report to EC the information stated in Section 4.0.

The EC will assess the situation, determine if the spill or discharge needs to be reported, determine what further response actions are necessary, and ensure that the appropriate notifications are made if required. The full Spill Response Procedures are provided in Section 4.0.

The contact information for the EC and other responsible facility personnel are provided in Appendix B of this plan. The facility must update this list as necessary as personnel and/or contact information change, in order to keep the information up to date and accurate. Contact information for federal, state, and local agencies is provided below.

NYSDEC Reportable Spill

All petroleum spills must be reported to the NYSDEC unless they meet all of the following requirements:

- The spill is known to be less than 5 gallons; and
- The spill is contained and under control of the spiller; and
- The spill has not and will not reach the water or land; and
- The spill is cleaned up within 2 hours of discovery.

For any spills deemed not reportable by this definition, the facts concerning the incident must be documented by the EC as described in Section 6.10, and recorded in Appendix C – “Spill History Summary”, and maintained with this plan for at least five years.

In the event of a NYSDEC Reportable Spill (as defined above), the following office **must** be notified within 2 hours of a spill or discovery of a spill:

NYSDEC Spill Hotline

(800) 457-7362

EPA Reportable Discharge

For the purposes of reporting to the EPA National Response Center, a reportable discharge is defined as:

- A discharge of oil that causes a sheen or discoloration of the surface of a body of water;
- A discharge that violates any applicable water quality standards; and
- A discharge that causes a sludge or emulsion to be deposited beneath the surface of the water or on adjoining shorelines.

In the event of an EPA Reportable Discharge (as defined above), the following offices **must** be notified immediately or within 2 hours of discovery:

NYSDEC Spill Hotline

(800) 457-7362

**USEPA National Response Center
U.S. Coast Guard, Duty Officer
400 Seventh Street
Washington, DC 20590**

(800) 424-8802

5.1 Additional Notifications

In the event of a reportable petroleum spill or discharge (as defined above), the following offices may also require notification:

NYSDEC Region 7 Division of Environmental Remediation Bureau of Spill Prevention and Response 615 Erie Boulevard West Syracuse, NY 13204	(315) 426-7519
Fire Department	911
Emergency Medical Services	911
Onondaga County Department of Health	(315) 435-3252
Onondaga County Division of Emergency Management	(315) 435-2525

5.2 Regulatory Notifications

EPA Written Notification

Per SPCC regulations, if more than 1,000 gallons of oil is discharged (as defined above) in a single spill event, or in quantities of 42 gallons or more in two (2) spill events occurring within a 12-month period, the EPA shall be notified in writing of the spill event or events. The written notification to EPA must include, at a minimum, the following pieces of information as outlined in 40 CFR Part 112.4(a), as follows:

- Name of the facility;
- Name of the owner or operator of the facility;

- Location of the facility;
- Maximum storage or handling capacity of the facility and normal daily throughput;
- Corrective action and countermeasures enacted, including a description of equipment repairs and replacements;
- An adequate description of the facility, including maps, flow diagrams and topographical maps, as necessary; and
- Additional preventive measures taken or contemplated to minimize the possibility of recurrence.

The written notification to EPA must be reviewed and signed by the EC involved in spill response or designated facility personnel. The EPA Regional Administrator may require the facility to amend this SPCC Plan upon evaluating the spill notification. Within 30 days of EPA notice to amend the plan, the P.E. certified amendment must be forwarded to the EPA.

6.0 Preventative Measures Provided (40 CFR 112.7(c))

This section discusses appropriate containment and/or diversionary structures or equipment used to prevent discharged oil from reaching navigable waters of the United States. Per the requirements of 40 CFR Part 112.7(c), one of the following preventative systems or its equivalent must be used at a minimum:

Requirements for onshore facilities:

- (i) dikes, berms or retaining walls sufficiently impervious to contain spilled oil;
- (ii) curbing;
- (iii) culverting, gutters, or other drainage systems;
- (iv) weirs, booms, or other barriers;
- (v) spill diversion ponds;
- (vi) retention ponds; and
- (vii) sorbent materials.

The preventative systems used for facility drainage containment control measures and specific secondary containment requirements for bulk storage containers are described below. In addition, spill prevention facilities, equipment and practices utilized at the facility to prevent oil discharges are outlined as preventative measures provided at the facility.

6.1 Facility Drainage Controls (40 CFR 112.7(a)(3)(ii), 112.7(a)(3)(iii), and 112.8(b))

The facility currently stores Speedi-Dry in the maintenance area of the Main Building for use in minor spill events. Oil spill response kits (spill kits) are located as described in Section 6.5. Heavy machinery is available onsite if needed for spills outside buildings. Any spills are attempted to be contained to

the immediate area of the spill following the spill response procedures described in Section 4.0. Per the IP, secondary containment will be provided for drums stored in the Main Building in drum storage areas D-1 (maintenance area) and D-2 (aluminum shredder area).

Spills inside the maintenance area (D-1) are contained by the spill pallet (to be provided per the IP), concrete floor, and the use of spill kit response. If a spill were large enough to migrate outside the facility it would flow to Outfall 001. Spills in the aluminum shredder area (D-2 and OFT-3) are contained by a trench drain system that drains to the pump station which transmits the fluids to Outfall 001. Spills at Storage Bin No. 7 (Tanks 103, 104, D-1, D-2, and D-3) flow into a 1,000 gallon underground holding tank. Other spills that occur in exterior storage areas of the western portion of the site (OFT-4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, and 15) will also drain to Outfall 001. Per the IP, Outfall 001 is to be fitted with an oil water separator designed to capture and retain oil to the site. The separator will be designed and operated to maintain at a minimum, oil storage capacity to contain the largest probable spill from DA-1 (303 gallons of transformer oil from OFT-3).

Potential releases from OFT-1, 2, 16, 17, and 18 flow to Outfall 002, which has no oil retention devices. As allowed by rule, a Spill Contingency Plan is utilized in place of secondary containment and drainage controls (see Section 13.0).

At the time of the site examination, localized drainage from the Tank 101 and 102 transfer area was unrestricted at the time of the site examination. The following discussion describes the drainage controls recommended for the transfer area adjacent to these tanks:

6.1.1 Tank 101 and 102 Transfer Area

Tank 101 and 102 are 1,000-gallon and 2,000-gallon (respectively) hopper-style tanks with integral secondary containment. As outlined in the IP, transfer containment must be added for these tanks to contain potential spills during transfer events. The transfer area for these tanks is located in the paved yard east of the Main Building with general stormwater drainage to the northeast towards Outfall 002 (see Figure 2). As indicated in the IP, transfer containment must be provided to contain the "most probable" spill during a transfer event plus freeboard for a 25-year 24-hour storm event. Due to the pumped delivery to these tanks, the Engineer (Barton and Loguidice, P.C.) has determined that the most probable spill is 200 gallons. This is based on an estimated maximum off-load pumping rate of 200 gallons per minute and an operator response time of one minute. The transfer containment will be provided by one of the following methods: constructing a concrete transfer containment area, adding a rolled asphalt curb, installing a catch basin and holding tank, or installing other structures that meet the general containment requirements of 40 CFR 112.7. The containment structure must be designed and maintained to capture and contain oil to the site until cleanup can occur.

6.2 Secondary Containment – Bulk Storage Containers (40 CFR 112.7(a)(3)(iii), 112.7(c), and 112.8(c)(2))

EPA SPCC regulations (40 CFR 112.8(c)(2)) require all bulk oil storage containers with a capacity of 55 gallons or greater to have secondary containment capable of providing 100% containment of the largest primary vessel plus sufficient freeboard to contain precipitation (typically 10% of the primary vessel or a 25-year 24-hour storm event, whichever is greater). Calculations of secondary

containment capacity for all tanks and drum storage areas are provided in Appendix I. The following is a description of secondary containment of bulk oil storage containers at the facility:

Tanks 101 and 102 are hopper style secondary containment tanks designed to provide 110% secondary containment.

Tanks AD-1, AD-2, and AD-3 are equipped with secondary containment that is integral to the construction of the auto dismantler in addition to being located within Storage Bin No. 7 (secondary containment described below).

Tanks 103, 104, AD-1, AD-2, AD-3 and drum storage D-3 are located within Storage Bin No. 7 which is equipped with trench drains that drain to a 1,000-gallon underground holding tank.

Per the IP, drums storage D-1 and D-2 will be provided with spill pallets to contain at least 110% of the volume of the largest container stored.

6.2.1 Proposed Oil/Water Separator

Per the IP, the facility plans to install an underground stormwater treatment oil water separator system used to treat water prior to discharge at Outfall 001. Water is collected in a series of catch basins throughout the western portion of the site and all of DA-1. The oil water separator will be designed to capture and retain oil within the separator. The proposed oil/water separator will be inspected for adequate oil capture capacity monthly (minimum 303 gallons) and will be maintained every three months or as needed by an environmental contractor. Filters associated with the oil water separator will be maintained in accordance with manufacturer

recommendations. Following installation, it is recommended that the facility develop an operations and maintenance procedure for the oil/water separator to ensure proper operation.

6.2.2 Oil-Filled Operational Equipment

Potential releases from OFTs-4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, and 15 flow to the stormwater treatment oil water separator system at Outfall 001 described above, which provides 110% containment of the largest container in the drainage area.

In accordance with modifications to the EPA SPCC rule effective February 26, 2007, a spill contingency plan may be provided for oil-filled operational equipment which has no history of discharges as described in 40 CFR Part 112.1(b), in place of general secondary containment requirements of 40 CFR Part 112.7. A spill contingency plan provides a written commitment of work force, equipment, and materials, as well as establishes an inspection and monitoring program to detect equipment failures or oil discharges. MARI is utilizing a spill contingency plan to meet the general secondary containment requirements for OFT-1, 2, 16, 17, and 18 (see Section 13.0 - Spill Contingency Plan).

6.3 Drainage of Diked Areas and Effluent Treatment Facilities (40 CFR 112.8(b), 112.8(c)(3), and 112.8(c)(10))

All secondary containment basins, double wall tanks, underground containment tanks, proposed transfer containment areas and proposed oil water separator at Outfall 001 must be inspected at least monthly, and prior to any discharge, for accumulation of water, oil, or oily sheen prior to draining by a

trained facility employee. Discharge valves for secondary containment structures must be operated manually and must be closed and locked when not draining containment. The facility must perform the appropriate discharge screening and monitoring as indicated on pages 9 and 10 of the facility's SPDES Discharge Permit. If evidence of oil, an oily sheen, odor, or foaming is noted during inspection of the secondary containment, the fluids must be promptly sampled removed and disposed of in accordance with the facility's SPDES Discharge Permit and all applicable state and federal regulations for chemical or petroleum contaminated waste. If no oil, sheen, odor, or foam is present, the facility may proceed with drainage of clean stormwater and resealing of the secondary containment under trained and responsible supervision. Records of monthly secondary containment inspections are maintained in Appendix J. A log of each secondary containment discharge must be completed and maintained in Appendix K.

Once the secondary containment structures required in the IP are installed, secondary containment discharge logs must be completed to drain stormwater collected within the new containment areas as appropriate.

The facility is subject to a State Pollution Discharge Elimination System (SPDES) permit (MARI SPDES Permit #NY026-1947, issued on April 4, 2007) with site specific discharge requirements.

6.4 Overfill Prevention System (40 CFR 112.8(c)(8))

Tanks 101, 102, AD-1, AD-2 and AD-3 are fitted with tank gauges used to prevent overfills. Per the IP, the tank gauge on Tank 101 will be supplemented with tank level to volume conversion chart to allow the facility personnel to

accurately determine the level of product in the tank to prevent overfills. Per IP, tanks 103 and 104 will be fitted with tank gauges.

Drums are generally used as single use containers and are returned to suppliers or utilized for non-petroleum storage operations on site, when empty. Filling of drums storing used oil is monitored visually during filling events to prevent overfills.

6.5 Spill Prevention and Equipment

Per the IP, oil response spill kits will be located and/or updated in the fleet fueling area, storage bin No. 7, maintenance area (Main Bldg.), blockhouse (aluminum shredder area of the Main Bldg.), pump house at the CAMU, and main substation. Per the BMP Plan, spill kits are also located in the non-ferrous metals receiving area, chip storage area, scrap processing area, and loading docks. Spill kits are to be located in close proximity to all oil storage and transfer locations so that they are easily seen by and accessible to employees, and shall be clearly labeled. When items from a spill kit have been expended, those items must be replaced immediately to be available for future use. Sorbent pads or other materials contaminated with petroleum after cleaning up any spills must be cleaned or disposed of in accordance with applicable state and federal regulations. Spill kits must be inspected at least monthly by facility staff to ensure that all materials have been inventoried and are ready for future use.

Appendix L provides the required spill kit contents. Spill kits are large enough to contain at least a 55-gallon spill.

6.6 Good Housekeeping

Good housekeeping practices are designed to maintain a clean and orderly work environment throughout the facility. This practice includes the training of staff in proper operation and maintenance of oil storage equipment, immediate cleanup of minor spills, implementing and following oil clean up procedures, and implementing the spill prevention measures included in this plan.

6.7 Preventative Maintenance

Preventative maintenance involves regular inspections of tanks, drums, and equipment for leaks, as well as making adjustments and repairs of equipment and petroleum systems. Maintenance and repair records must be maintained at the facility and incorporated into this SPCC Plan. Monthly inspections and reporting for aboveground storage tanks and drum storage areas must be conducted in accordance with the Petroleum Bulk Storage requirements of 40 CFR Part 112 and 6 NYCRR Part 612-614. A monthly inspection log is provided in Appendix J. The monthly logs must be signed by the inspector and maintained with the SPCC plan for a minimum of ten years.

6.8 Piping (40 CFR 112.8(d))

All aboveground piping must be inspected monthly, with observations noted in the monthly inspection log (Appendix J). The inspection must include an assessment of the condition of items such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces. Replacement piping must conform to NYSDEC PBS regulations. Piping not in service must be capped or blank-flanged to the terminal connection.

Integrity and leak testing must be conducted for all piping at the time of installation, modification, construction, relocation, or replacement.

The aboveground piping at the facility is located in areas that are not accessible to vehicular traffic. As such, signs and warning measures are not necessary for piping locations.

6.9 Employee Training

The EC or designated responsible person must train all oil-handling employees in proper machinery maintenance and operation, spill prevention and containment procedures, good housekeeping practices, applicable regulations, and the contents of this SPCC plan. This training must be conducted at least annually or more frequently if needed. All new oil-handling employees must receive training prior to handling oil at the facility (see Section 8.0).

6.10 Record Keeping

Records must be maintained for all spill or leak incidents occurring at the facility. Records of spills must be maintained in Appendix C, and shall be maintained for at least 5 years. All records must include the following minimum information when available:

- Name and title of employees involved in spill response;
- Date and time of incident;
- Weather conditions;
- Duration of incident;
- Estimated volume of spill leak;
- Cause of spill incident;

- Environmental impact (include potential receptors, i.e., water bodies, drinking water wells, residential, aquatic, biological, etc.);
- Parties notified;
- Spill response summary;
- Estimation of volume of oil recovered;
- Waste disposal records;
- Regulatory notifications (if necessary);
- Operating procedures and equipment upgrades needed to prevent recurrence;
- Recommendations to prevent future spills.

7.0 Inspections, Testing and Record Keeping (40 CFR 112.7(e) and 112.8(c)(6))

7.1 Periodic Integrity Testing – Not Applicable to All Facilities

In accordance with 40 CFR 112.8(c)(6), each aboveground container must be tested on a regular schedule for integrity. All tanks, including well-built shop tanks, drums, and totes in all conditions must employ one of the inspection techniques that follow. Appropriate techniques for integrity testing could include: hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emission testing, or another system of non-destructive shell testing. Integrity testing would typically be conducted by a certified tank testing firm or Professional Engineer. Inspection reports for each integrity test must be maintained with this plan and be made available to inspectors upon request for a period of at least ten (10) years. Records must be maintained in Appendix M of this plan.

Well-built shop tanks with capacities less than 30,000 gallons can meet the integrity testing requirement through monthly visual inspections combined with another form of testing. Providing other measures of protection, including elevation of the container or a barrier placed between the container and the ground, would provide environmental equivalence to the alternate testing as they would decrease corrosion potential and ensure detection of container failure.

At the time of inspection, the facility had no bulk oil storage containers in operation that required periodic integrity testing. All tanks and drums stored at the facility meet the definition of well-built shop tanks which allow the use of environmentally equivalent methods to integrity testing. All aboveground tanks at the facility are situated on saddles and/or are above a concrete pad or other impervious surface. Drums are stored on spill pallets or concrete floors. Monthly visual inspections are conducted to

inspect all sides of the tanks and drum storage areas to meet the intent of the integrity testing provision in the rule. If modifications are made to the facility in such a way that requires integrity testing, the SPCC Plan must be amended and testing records stored with the plan in Appendix M.

7.2 10-Year Inspections – Not Applicable to All Facilities (6 NYCRR 613.6(b))

In accordance with NYSDEC PBS regulation 6 NYCRR 613.6(b), aboveground containers must undergo a detailed inspection every ten (10) years if: the tank has a capacity greater than 10,000 gallons; or, if tank capacity is less than 10,000 gallons, but the tank could reasonably be expected to discharge to waters of the state. Ten-year inspections must include tightness testing of the tank and any underground pipes or an inspection that consists of: cleaning of the tank to industry standards; the removal, transport, and proper disposal of sludge, inspecting the tank shell using a non-destructive test to detect thinning, a visual inspection of the internal surfaces of the tank, inspection of the internal coatings, and a tightness test of underground piping. Required 10-year inspections are typically conducted by a certified tank testing firm or Professional Engineer. Inspection reports for each ten-year inspection must be maintained with this plan and made available to inspectors upon request for a period of at least ten (10) years. Records must be maintained in Appendix M as required.

Ten-year inspections are not required for tanks that are entirely aboveground, such as tanks that are on racks, cradles, or stilts, or tanks placed on an impermeable barrier like concrete. Tanks storing #5 or #6 fuel oil are also exempt from ten-year testing.

The facility currently has no bulk oil storage containers that require ten-year testing. All tanks and drums stored at the facility undergo monthly

visual inspections and are situated on concrete, an impervious surface or on saddles.

7.3 Comprehensive Annual Facility BMP Review

A comprehensive annual facility review must be performed for all BMPs. This review consists of the following:

- Visual inspections of all areas of the facility which contribute to stormwater discharges or potential petroleum releases. These inspections will identify evidence of, or a potential for, contaminants entering the facility's drainage systems. During these inspections, existing measures used to reduce contaminant loadings will be evaluated to determine if they: 1) Are adequate and operating properly; 2) Are properly implemented; and 3) Require supplemental contaminant control measures. Visual inspections of the equipment required to adequately implement the BMP measures/practices will be conducted.
- Preparation of a report summarizing the inspection, the personnel making the inspection, the date(s) of the inspection, major observations relating to the implementation of the BMP, incidents of non-compliance, and any required follow-up actions. If no incidents of non-compliance are identified, the report will contain a certification that the MARI facility is in compliance with its BMP Plan. The report must be signed by the responsible corporate officer or a duly authorized representative of that officer. The most recent year's report will be maintained in Appendix N, with historic reports being maintained in the MARI Office Manager's office.

7.4 Monthly SPCC and Petroleum Bulk Storage Inspections

The facility is required to perform monthly visual inspections of all aboveground tanks, drum storage areas, and oil-filled equipment included in this SPCC plan. Monthly inspection forms are provided in Appendix J.

Monthly inspections are conducted in accordance with the requirements of 6 NYCRR Part 613 and 40 CFR 112, and typically involve a visual inspection to identify any oil staining or leaking, corrosion of tanks and associated piping, visible damage, discoloration and proper labeling. Inspections of leak detection equipment, tank interstices (for double wall tanks), secondary containment basins, and spill response kits must also be conducted monthly. Inspections for drums may consist of a general visual observation of each drum storage area; an inspection of each individual drum is not necessary. Drums that exhibit signs of corrosion or deterioration during the monthly inspections must be replaced immediately.

Inspection reports must include the following information at a minimum:

- Facility NYSDEC registration number (if applicable);
- Identification number of tank(s) inspected;
- Date of inspection;
- Results of inspection including items requiring repair;
- Certification from inspector that the inspection has been performed in a manner consistent with industry standards, applicable requirements and/or regulations;

- Name, address and phone number of inspector;
- Inspector's signature.

7.5 Facility Specific Monthly BMP Inspections

In addition to the inspections and maintenance practices described above, monthly BMP inspections of the facility are also performed by at least one member of the BMP/Pollution Prevention Team. These inspections address all areas, activities and equipment identified in this Plan, as well as any other areas where industrial materials or activities are exposed to stormwater. The inspections are documented using the Monthly BMP Inspection Form located in Appendix O. The current year's records of the completed inspections are maintained in the same appendix. Historic inspection documentation is maintained in the MARI Office Manager's office.

Each monthly inspection includes an evaluation of the existing stormwater BMPs. Any deficiencies in the implementation of the SPCC/BMP will be corrected as a soon as practicable, but not more than 14 days from the date of the inspection for issues that can be readily resolved. If it is determined that any BMPs are not operating effectively, corrective measures, including any required maintenance activities, must be performed prior to the next anticipated storm event. If this repair schedule is not practicable, then the required maintenance will be completed as soon as possible, but not more than 12 weeks from the date of the initial inspection. All corrective actions and follow-up measures taken by the facility must be documented and maintained in the MARI Office Manager's office.

7.6 Facility Specific Weekly BMP and Transformer Inspections

Section 15.0 lists several specific items that will be performed or inspected on a weekly basis, including the: 1) Sweeping of paved areas and floor surfaces (if needed); 2) Inspection of facility spill kits; 3) Inspection and measurement of fluid levels in the fluid recovery tanks; 4) Inspection of the maintenance shop and CAMU area storage building; 5) Inspection of loading dock areas; 6) Inspection of dumpster areas; 7) Inspection of indoor and outdoor scrap storage areas; and 8) Inspection of transformers.

The facility is required to perform weekly visual inspections of all qualified oil-filled operational equipment (electrical transformers) as described in the Spill Contingency Plan (see Section 13.0). All of the oil filled electrical transformers listed in Appendix P are inspected on a weekly basis, and inspections are recorded in the same appendix. The transformers are each visually examined for signs of leakage and other damage.

The results of the weekly inspections are recorded on the Weekly BMP Checklist Form provided and maintained in Appendix Q for the current year. Historic Weekly BMP Inspection documentation is maintained in the MARI Office Manager's office. It should be noted that Weekly Inspection Checklists are not performed for the week of the month during which a monthly facility inspection is performed.

7.7 Facility Specific Daily BMP Inspections

Section 15.0 lists several specific items that are inspected on a daily basis, including the: 1) Turnings storage areas; 2) Scrap receiving areas; 3) Scrap vehicle storage area; and 4) Vehicle dismantling area. Inspection of these areas

is performed by employees who normally work in these areas and who have been trained to look for conditions that may result in potential impacts to stormwater. There is no documentation maintained for daily inspections; however, the Monthly BMP Inspections verify that the Daily Inspections are routinely performed.

7.8 Summary of Inspections/Testing

Table 7-1. Facility Inspection Summary		
Inspection Item	Inspection Method	Inspection Schedule
Entire Facility BMP and PBS Review	Visual inspection, see Section 7.3 and 12.1	Annually , document in Appendices N and U
Aboveground bulk storage containers	Visual inspection	Monthly and whenever material repairs are made, document in Appendix J
Container supports and foundations	Visual inspection	Monthly and whenever material repairs are made, document in Appendix J
Liquid level sensing devices and leak detection devices	Test for proper operation	Monthly , document in Appendix J
Diked containment areas, double wall tank interstices, and secondary containment basins	Visual inspection for presence of stormwater and presence of oil	Monthly and prior to all stormwater discharges, document in Appendices K and J
Lowermost drain and all outlets of tank trucks	Visual inspection	Prior to filling and departure
Aboveground valves, piping, hoses, dispensers and appurtenances	Visually inspect the general condition of items such as flange joints, expansion joints, valve glands and bodies, spill buckets, pipeline supports, locking of valves, and metal surfaces	Monthly , document in Appendix J
Areas of industrial activity	Visual inspection of housekeeping, preventative maintenance, spill prevention and response	Monthly , document in Appendix O
Qualified Oil-Filled Operational Equipment (see Section 13.0)	Visually inspect transformers and pads for leaks, proper operation, accumulation of water, and any damage or repair items required.	Weekly , document in Appendix P
Weekly BMP Inspections	Varies, see Section 7.6.	Weekly , document in Appendix Q
Daily Work Area Inspections	Visual Inspection – General inspection as described in Section 7.7.	Daily , document occurrence monthly in Appendix O

8.0 Employee Training (40 CFR 112.7(f))

MARI is committed to providing employees with current information related to operation, maintenance, and emergency response procedures for petroleum bulk storage facilities. Training includes annual meetings of personnel involved in storage tank management and operation, where applicable regulations and the provisions of this Combined SPCC/BMP Plan are reviewed. In addition, all new oil-handling employees receive training prior to handling oil at the facility. MARI uses the annual training to educate employees of the components and goals of the SPCC/BMP program. *

The tank management and operation personnel will review the procedures to contain and control any potential spill of oil or other hazardous material, or to prevent an unscheduled release to the environment. Any known discharges, malfunctioning components, and any recently developed precautionary measures will be addressed at the training meeting. Each staff member involved with oil handling, storage or machinery containing oil will periodically inspect and review the SPCC Plan as needed between each training meeting. All facility personnel are advised and alerted to report any actual or potential spills to the EC. The annual employee training log is provided in Appendix R. An example training meeting syllabus is also provided in this appendix. Training records are maintained in the MARI Office Manager's office.

9.0 Security (40 CFR 112.7(g))

The following section discusses measures installed at the facility to address site security in order to minimize the potential for accidental or deliberate release.

Fencing: 40 CFR Part 112.7(g)(1) has a requirement to fully fence each facility handling, processing, or storing oil, and lock and/or guard entrance gates when the facility is not in production or is unattended. Fencing each unsecured oil storage and handling area will provide the environmental equivalence of fencing the entire footprint of the facility, as providing fencing for oil handling, processing, and storage areas of the facility will reduce the potential for physical harm and vandalism to meet the security intent of the regulation. All petroleum storage areas at the facility are located inside or surrounded entirely by perimeter security fencing, except for Tanks 101 and 102 and OFTs 16, 17, and 18. The facility is in operation or staffed with security personnel 24 hours per day and therefore not required to be fully fenced.

Interior Security: The interior oil storage areas are secured within the locked main building when the facility is not operational.

Storage Tank Features: The following measures are adhered to when the storage tanks are in non-operating or non-standby status.

1. The pump starter controls are locked at the dispenser and the electric panels are secured in the main building during non-business hours. Only authorized staff has key access.
2. The loading/unloading connections and drain pipes are capped and locked when not in service or when in extended standby status.

3. All drain valves allowing direct outward flow of the container's contents remain in the closed position.
4. Power to exterior pumps is locked out during non-business hours except for those with authorized access.
5. The tank fill ports are locked during non-filling operations.

Lighting: The facility maintains perimeter exterior lighting during off-business hours. All interior oil storage areas are well lit by overhead lighting. Bulbs are replaced as needed to ensure oil storage areas are well lit.

10.0 Tank Truck Transfer Operations (40 CFR 112.7(a)(3)(ii))

The following procedures are for deliveries from tank trucks to facility Tanks 101 and 102. All suppliers must meet the minimum requirements and regulations for tank truck unloading established by the U.S. Department of Transportation (USDOT). The facility is responsible for informing its fuel supplier of these procedures prior to delivery.

Prior to Transfer

- A designated, trained facility employee shall be present to observe all oil transfers and to ensure that proper spill prevention procedures are followed. All oil delivery/pick-up personnel must be familiar with transfer procedures prior to making a delivery/pick-up.
- Have spill kit materials present, heavy equipment (if available) and trained personnel on standby, and fuel transfer containment structures (if applicable) in place.
- Maximum capacity for any single tank on a delivery/pick-up vehicle shall be as small as possible (relative to required delivery/pick-up volume) to reduce potential spill volume in the event of a spill emergency.
- Determine volume required for transfer in advance of shipment to avoid excess oil being delivered.
- A trained facility employee shall inspect shipping documents to verify type and quantity of oil being delivered.
- Identify fill port and receiving tank for oil being delivered/picked-up.

- Verify receiving tank has sufficient capacity for volume of oil being transferred.
- Place oil drip container under the appropriate connections as necessary. Ensure fill port spill buckets are in place and free of oil and water.
- Verify that drain valves of secondary containment structures are in the closed position (if applicable).
- Secure tank vehicle with wheel chocks and interlocks.
- Establish grounding/bonding wires.

During Transfer

- Connect to fill port and begin oil transfer. Immediately verify that there are no leaks and that the oil is transferring to the desired tank.
- Inspect piping and tanks including valves and connections for leaks during the delivery/pick-up.
- A trained facility employee must be present at all times during oil transfers to observe operations and insure that the oil transfer is terminated immediately when receiving tank is full. Check tank and piping system to verify that all valves are in the closed position. Do not uncouple the hose until the fill line has been properly emptied.
- Monitor liquid level in the receiving tank to prevent overflow.
- Monitor flow meters to maintain desired flow rate.
- Reduce flow rate when topping off tank to prevent overfill.

Following Transfer

- After transferring oil, make sure lines are fully emptied.
- Disconnect grounding/bonding wires.
- Uncouple hose from fill port and securely cap the fill line. Secure all valves controlling the flow of oil into the tank in the closed position.
- A trained facility employee must verify that the delivery/pick-up vehicle is disconnected from tanks and piping prior to exiting from the facility.
- Remove wheel chocks and interlocks.
- Once the delivery/pick-up vehicle has exited the facility, an employee shall inspect the transfer area to insure that no oil has been leaked or spilled during the transfer. Any spilled or leaked oil shall be contained and cleaned up immediately, and the EC must be contacted.
- Document and keep records of all transfers including: certification of equipment and personnel on standby for the transfer, quantity of oil delivered/picked-up, identification number of receiving tank, and any problems encountered during the transfer operation (see Appendix S).

11.0 Review and Evaluation of Plan (40 CFR 112.5)

11.1 Annual Review of SPCC Plan

The facility management will review the SPCC plan annually to determine if the plan is adequate for the facility, and that the plan is being fully implemented. Any changes identified during this review will be incorporated into the plan as addressed in the following sections.

11.2 Facility Design Change Amendments (40 CFR 112.5(a))

This SPCC Plan must be reviewed and amended by the EC or Owner in accordance with the requirements of 40 CFR 112 any time there is a change to the facility design, drainage, operations, or maintenance that affects that facility's potential for a discharge as defined in 40 CFR 112.1(b). Changes of this type require technical amendments to the plan and certification by a Professional Engineer (unless facility meets the requirements of 40 CFR 112.6). Examples of changes that are considered technical amendments include, but are not limited to, the following:

- Commissioning or decommissioning of containers;
- Relocation, replacement, or reconstruction of oil storage containers;
- Installation, reconstruction, or replacement of piping systems;
- Construction or demolition that may alter secondary containment structures;
- Changes of product or service;

- Revision of standard operation or maintenance procedures at a facility;
- Changes to the drainage or grading for the facility.

Amendments to the SPCC Plan required under this section must be prepared within 6 months of the change. Implementation must be completed as soon as possible, but not later than six months following the SPCC Plan amendment. Amendments to the plan must be documented in Table T-1 (SPCC Plan Amendment Log) located in Appendix T.

11.3 Non-Technical Change Amendments

Facility changes requiring administrative (non-technical) amendments to the Plan do not require certification by a Professional Engineer. Examples of changes that are considered non-technical amendments include, but are not limited to, the following:

- Change in facility name;
- Change in Emergency Contact information or Emergency Coordinators;
- Change in Emergency Spill Contractors.

All non-technical amendments must be documented in Table T-1, (SPCC Plan Amendment Log) located in Appendix T.

11.4 Five-Year SPCC Plan Review (40 CFR 112.5(b))

In addition to the facility design change amendments described above, a complete review and evaluation of this SPCC Plan must be conducted at least once every five (5) years by the EC or Owner. As a result of this review and evaluation, the EC must amend this SPCC Plan, if required, within six (6) months of the review to include more effective prevention and control technology if: (1) such technology will significantly reduce the likelihood of a spill or discharge event from the facility, and (2) if such technology has been field-proven at the time of the review. Any technical amendments to the SPCC Plan (as described in Section 11.1, above) must be certified by a Professional Engineer (unless facility meets the requirements of 40 CFR 112.6) within six (6) months after a change in the facility's design, construction, operation, or maintenance occurs, which materially affects the facility's potential for the discharge of oil into or upon the "Navigable Waters of the United States" or adjoining shores. Any amendments to the plan must be implemented as soon as possible, but not later than six months following the SPCC Plan amendment. Upon review and evaluation of the Plan, management must complete the review certification found in Appendix T. If the plan requires amendment as a result of the 5-year review, Table T-1 (SPCC Plan Amendment Log) located in Appendix T, must be completed.

11.5 BMP Plan Amendments

The BMP Plan will be modified whenever: 1) Changes at the facility materially increase the potential for releases of pollutants; 2) Actual releases indicate the Plan is inadequate or ineffective; or 3) A letter from NYSDEC identifies inadequacies in the Plan.

All BMP Plan revisions must be submitted to the NYSDEC, Regional Water Quality Engineer within 30 days and documented on Appendix T and Table T-1. Previous versions of the Plan will be maintained in the MARI Office Manager's office. Prior to submittal of a revised plan, it will be reviewed and approved by a qualified professional and MARI management. MARI's certification will verify the commitment of the necessary resources for its implementation. Revised plans will be submitted to:

New York State Department of Environmental Conservation
Regional Water Engineer
615 Erie Boulevard West
Syracuse, New York 13204

12.0 Conformance (40 CFR 112.7(j))

Based upon the initial site inspection of the facility, this SPCC Plan conforms to the minimum requirements and sequencing of 40 CFR 112 (Oil Pollution Prevention) with exception of the items addressed in the Implementation Plan (see Section III).

12.1 Conformance with Applicable State Regulations

NYSDEC PBS regulations (6 NYCRR Parts 612, 613 and 614) regulate the storage and handling of petroleum in New York State. The rule applies to any facility with a cumulative petroleum bulk storage capacity above 1,100 gallons. A NYSDEC PBS Regulation Compliance checklist is provided in Appendix U, and must be completed annually to ensure that the facility remains in compliance with NYSDEC regulations in effect at the time this plan was written. When NYSDEC PBS regulations change, this checklist must be modified accordingly. The following minimum requirements must be met in order to comply with the regulations:

1. Registration with NYSDEC if the total facility storage capacity exceeds 1,100 gallons as specified in Section 612.2. Registration certificate must be conspicuously displayed;
2. Color code tank fill ports as specified in Section 613.3(b) – See Appendix V for color coding guidance;
3. Use appropriate shut-off valves for dispensing fuel as specified in Section 613.3(c)(1) and (2);
4. Gauges for aboveground storage tanks:

- a. All aboveground tanks must be equipped with a gauge that accurately shows the level of product in the tank as specified in Section 613.3(c)(3). The gauge must be accessible to the carrier and be installed so that it can be conveniently read;
 - b. The design capacity, working capacity and identification number of the tank must be clearly marked on the tank and at the gauge;
 - c. A high-level warning alarm, a high-level liquid pump cutoff controller, or an equivalent device may be used in lieu of the gauge requirement;
5. All fill pipes leading to a pump-filled petroleum tank must be equipped with a check valve or equivalent device which provides automatic protection against backflow as specified in Section 613.3(c). This is only required when it is possible for backflow to occur;
6. Provide operating valves for gravity fed tanks as specified in Section 613.3(c)(5).
7. Provide secondary containment for aboveground storage tanks as specified in Section 613.3 (c)(6);
8. Maintain all petroleum related equipment and spill prevention equipment in good working order as specified in Section 613.3(d).
9. Conduct monthly and ten-year inspections of aboveground petroleum bulk storage tanks and related equipment as specified in Section 613.6 and maintain written records;
10. Report spills and/or discharges as specified in Section 613.8;

11. Close out-of-service tanks as Specified in Section 613.9;
12. Install all new tanks (post-1985) or modify existing tanks in accordance with the requirements of 6 NYCRR Part 614.

13.0 Spill Contingency Plan (40 CFR 112.7(k))

13.1 Introduction

This Spill Contingency Plan covers oil-filled operational equipment located at the facility and is prepared in accordance with 40 CFR Part 109, Criteria for State, Local and Regional Oil Removal Contingency Plans. The oil-filled operational equipment at the facility covered by this plan includes oil filled transformers OFT 1, 2, 16, 17 and 18. The purpose of this spill contingency plan is to implement a strategy to insure timely, efficient, coordinated, and effective action to minimize damage resulting from oil discharges. Also included in this Plan is a monitoring and inspection program to detect any equipment failure or discharge of oil before a major or catastrophic release occurs.

This Spill Contingency Plan must be implemented whenever a discharge of oil from qualified oil-filled operational equipment at the facility has reached, or threatens, adjacent waterways and drainage paths at the facility. Prior review and understanding of this Plan by facility personnel is essential for the effectiveness in containing and minimizing the effects of an oil spill from the oil-filled operational equipment located at the facility.

13.1.1 Oil-Filled Operational Equipment

Oil-filled operational equipment includes equipment fitted with oil storage with the primary purpose of supporting the main function of the operating equipment. MARI maintains oil-filled electrical transformers that qualify as "oil-filled operational equipment." Oil-filled operational equipment is excluded from bulk storage container requirements referenced in 40 CFR Part 112, but is subject to the general secondary containment requirements

of 40 CFR 112.7(d). Under the 2006 SPCC rule revisions, oil-filled operational equipment located at a facility that has not had an oil discharge described in 40 CFR Part 112.1(b) since becoming subject to SPCC requirements is allowed to follow an oil spill contingency plan without the requirement to provide an impracticability determination for secondary containment requirements described in 40 CFR Part 112.7(d). The following describes the oil-filled operational equipment located at the facility:

MARI operates five (5) transformers at the facility that are considered oil-filled operational equipment and do not have secondary containment. The transformers are used to step the power voltage down prior to distribution at the facility or use at specific machinery. All of the transformers are owned by MARI. OFT-1 and 2 are located at the main substation, south of the Main Building and contain 674 and 564 gallons of non-PCB, electrical cooling oil (respectively). OFT-16, 17 and 18 are located east of the pump house at the CAMU and contain 78 gallons (each) of non-PCB electrical cooling oil. The locations of the facility transformers are shown on Figure 2.

13.2 Monitoring and Inspection Program

The oil-filled operational equipment monitoring and inspection program involves regular inspections of the equipment, as well as inspections of the concrete pads or floors on which the equipment is mounted for evidence of oil leaks. Inspections will be conducted weekly by trained facility personnel, must document any discharge present on or around equipment, the equipment condition and operational status, as well as housekeeping issues associated with the equipment and surrounding area. Inspection logs are completed for each

inspection and are maintained in Appendix P of this Plan. If a spill or release of oil from any oil-filled operational equipment is identified during the weekly inspection, appropriate response procedures will be followed as described in Section 13.3, below.

Maintenance and repair records for oil-filled operational equipment at the facility are maintained in Appendix W of this Plan. Maintenance and repair issues identified during weekly inspections must immediately be addressed and remedied as soon as possible.

13.3 Affected Waters

Drainage pathways to Waters of the U.S. are identified in Section 2.6 and must be monitored to prevent discharges to off-site locations once a spill has occurred. Oil-filled operation equipment locations and surrounding drainage pathways and receiving waters are shown on Figure. The following is a description of each location and the corresponding drainage for the area:

OFT-1 and 2 are located southeast of the Main Building near the facility entrance. Stormwater draining from this area flows north to catch basins on the paved yard of the facility and eventually to Outfall 002 (see Figure 2). OFT-16, 17, and 18 are located adjacent to the Metal Storage Shed at CAMU. Stormwater draining from this area flows northeast to Outfall 002. Stormwater discharges from Outfall 002 flow north via a drainage swale and off-site to Ley Creek.

Worst case discharges (i.e. full storage volume) involving a catastrophic failure from the equipment described above have the potential to reach the "Waters of the U.S." if not properly addressed and contained. The spill contingency plan addresses both major discharges that affect or have the

potential to affect offsite waters, as well as spills classified as minor discharges that can be confined within the facility.

13.4 Spill Response Procedures

13.4.1 *Spill Response Coordinator*

Facility personnel trained in spill response will provide the initial response upon the discovery of a release from oil-filled operational equipment at the facility (see Appendix B for employee names and contact information). The aluminum smelter is staffed 24 hours per day, 7 days per week, with employees trained for emergency spill response. The Spill Response Coordinator, herein referred to as "Emergency Coordinator (EC)", is responsible for contacting, directing, and providing information to the team in the event of a spill from the oil-filled equipment. The EC is also responsible for collecting information regarding the spill from first responders and determining the appropriate procedures to be followed. Spill response actions are described in Section 13.3.2.2.

The EC will provide communication and coordination with outside agencies including local, state and federal government agencies, as well as emergency spill contractors as necessary. If required, the EC will request assistance with cleanup measures. The EC will provide oversight for all stages of the spill including spill response, cleanup, and assessment of damages and will notify the appropriate agencies following a spill.

13.4.2 Spill Response

Potential spills from oil-filled operational equipment at the facility will be classified as either minor spills or major spills as described below:

- Minor Spills – Minor spills are defined as small volume spills (generally less than 5 gallons) or leaks from the oil-filled equipment that are determined to have no threat of reaching off-site waters. Minor spills will likely be observed during the weekly inspection of the equipment by trained facility personnel. Any spills or leaks of oil will likely be visible on the base of the equipment and the concrete pad. Minor spills will likely require spill response only from trained facility personnel.
- Major Spills – Major spills are defined as spills from the oil-filled equipment of large volume (generally 5 gallons or more). Likely causes of a major oil-filled equipment spill include catastrophic equipment failure and vehicular impact causing rupture. Measures have been taken to minimize these causes by conducting weekly visual inspections, and protecting the oil-filled equipment with concrete filled bollards wherever possible. Major spills from the oil-filled equipment may be detected by weekly inspections, but will more likely be identified through transformer failure and power shutdown. During normal business hours, any major spill from the oil-filled equipment will be identified by facility personnel.

See Section 4.0 for Spill Response Procedures. A spill documentation form is provided in Appendix G for use in documenting and reporting the occurrence of a spill. Along with the spill response described in Section 4.0, the following actions will be completed if a major spill has occurred based on visual assessment.

1. Deploy additional spill kit material including spill socks, temporary diking, sorbent pads and sorbent material down gradient from the spilled oil, before inlet to nearby drainage paths or catch basins.
2. Activate on-site heavy equipment to berm soil to prevent or divert oil from reaching drainage ditches, or off-site waters.
3. Deploy floating spill booms, as necessary, on affected drainage pathways and any other waters.
4. Inspect offsite drainage pathways (Outfalls 001 and 002) and deploy additional control measures if needed.

13.4.3 Spill Cleanup Procedures

The EC will coordinate cleanup efforts following a major or minor spill from oil-filled operational equipment at the facility. Spill response material used as a control or countermeasure for containing oil may require hazardous waste characterization prior to disposal. All oil contaminated materials will be stored and disposed of in accordance with federal, state and local regulations. Any oil contaminated soils or water will be disposed of in accordance with appropriate federal, state and local regulations or as otherwise directed by NYSDEC.

13.4.4 Spill Notification

The EC will contact and inform the applicable authorities upon identification of a spill as outlined in Section 5.0.

13.4.5 Spill Response Review Meeting

Within 30 days following a spill event from oil-filled operational equipment requiring employee spill response, a spill response review meeting will be held with employees and the EC to discuss procedures and action taken during the event. Changes to the procedures will be discussed as needed. Any changes or modifications to the spill response procedures resulting from this meeting will be incorporated into the Spill Contingency Plan within 60 days by the EC. Any technical changes must be certified by a licensed Professional Engineer.

13.5 Materials, Supplies, Equipment, and Staff

Per the IP, spill kits are located adjacent to the oil-filled equipment as described in Section 6.5 and as shown on Figure 2.

The facility also maintains heavy equipment on-site that is available for emergency response in the event of a spill. The EC or designated employee will contact trained employees via on-site communication systems or by the employee phone number list.

If additional manpower is required for spill response, employees will be notified by telephone by the EC or designated employee and will report for spill response. Employees are trained for an emergency spill event, and have

knowledge of the site and oil-filled equipment locations, as well as spill cleanup materials and heavy equipment available at the site. In the event of a major spill needing advanced communications and coordination with outside agencies, an oil spill response operations center will be set up in the Main Office.

13.6 Employee Training

Annual employee training is conducted as outlined in Section 8.0. The EC and trained spill response personnel will review the procedures to contain and control any potential spill of oil from the oil-filled equipment included in this spill contingency plan. Each staff member involved with the oil-filled equipment will periodically inspect and review this Spill Contingency Plan as needed between each training meeting.

14.0 Potential Pollutant Sources

14.1 Inventory of Potential Pollutant Sources

The industrial operations performed by MARI include the storage, use, and handling of various fluids and materials (both non-regulated and regulated), as well as the generation of various waste streams. Due to nature of the operations and the current design and layout of the facility, there is a potential for some of these materials to be exposed to precipitation. Table 14-1 presents a list of potential pollutant source materials used or stored on-site by the facility that have the potential to impact stormwater quality, along with the locations and drainage areas where they can be expected to be found.

Table 14-1. List of Potential Pollutant Sources	
Material Name	Areas(s) at Facility Where Used or Stored
Lubricants/Oils	Maintenance Area up to (6) 55-gallon drums (Main Building Interior) (DA-1)
Transformer Oils	Present in all transformers, both active and inactive, located at six locations (DA-1 and DA-2). See Table 2-1, Appendix E and Figure 2
Antifreeze/Coolant	Maintenance Area, storage shed near pump house (DA-1)
Used Antifreeze	Vehicle dismantling rack (1) 180-gallon holding tank Storage Bin No. 7 (DA-1)
Used Gasoline	Vehicle dismantling rack (1) 180-gallon holding tank Storage Bin No. 7 (DA-1)
Diesel Fuel	Petroleum bulk storage areas: (1) 2,000-gallon bulk tank and (1) 1,000-gallon bulk tank at Fleet Fueling Area; and (1) 250-gallon portable bulk tank in Storage Bin No. 7 (DA-2)
Used Oil	Storage Bin No. 7: Vehicle dismantling rack (2) 180-gallon holding tanks; (1) 300-gallon used oil AST; and up to (6) 55-gallon drums all located in (DA-1). Aluminum Shredder Area: (2) 55-gallon drums (Main Building Interior and DA-1)
Used Cutting Oils	Three underground collection tanks that receive fluids from covered storage area trench drains: (3) 1,000-gallon tanks; One (1) 2,000-gallon under ground fluid recovery tank that receives fluids from the scrap storage area adjacent to Storage Bins (DA-1)
Paints/Miscellaneous	Storage room adjacent to scrap sorting (Main Building interior)
Lead-Acid Batteries	On pallets in scrap sorting area (Main Building interior)

Table 14-1. List of Potential Pollutant Sources	
Material Name	Areas(s) at Facility Where Used or Stored
Salt Flux	Covered Storage Bins west of Main Building (DA-1)
Baghouse Fines	Baghouse areas and in steel storage building west of Main Building (DA-1)
Lime	Lime injected baghouse area and steel storage building west of Main Building (DA-1)
Residual Oils	Scrap Yard Storage (DA-1)

14.2 Petroleum Products

The petroleum products used by the MARI facility include lubricating oils, hydraulic oil, motor oil, used oil, used gasoline, diesel fuel and transformer oil. These petroleum products are utilized for, or generated by, the operation or maintenance of the facility's heavy equipment, the dismantling of scrap vehicles, or the operation of on-site electrical transformers. Given this Plan incorporates information required under the SPCC planning provisions as described in Section I, detailed information concerning petroleum bulk storage is presented in Sections 1.0 through 13.0 of this Plan. The petroleum products stored at the facility with the corresponding storage volumes are listed as part of Table 2.

14.2.1 Bulk Petroleum Products

Bulk petroleum products are generally received and stored in a number of locations in bulk tanks, 55-gallon drums or other smaller containers. These containers remain inside their respective buildings protected from exposure to precipitation and wind, and generally pose a very low threat of contaminating stormwater. Empty returnable containers are stored inside the facility until they are returned to the respective supplier, recycled as scrap or reused appropriately. The potential for the greatest impact to stormwater would be related to the release of petroleum resulting from the overfilling of a tank by, or a release from, a fuel delivery

truck, or the overfilling of a vehicle fuel tank during refueling activities. Larger releases of this type would be controlled by responding with spill kit materials as described in Sections 4.0.

14.2.2 Transformer Oils

There are a total of 18 oil-filled electrical transformers at the facility (some of which are inactive) with a combined oil capacity of 2,684 gallons. Individual transformer capacities range from 57-674 gallons (Appendix E presents specific locations and corresponding capacities). The transformers without secondary containment (those listed in Appendix P) are inspected on a weekly basis for the presence of leaks or damage using the Weekly Inspection Log for Oil-Filled Operational Equipment (see Appendix P). All transformers are inspected at least monthly using the Monthly SPCC and PBS Inspection Log (Appendix J). The potential for the greatest impact to stormwater would be related to the catastrophic release of transformer oil due to a vehicle impact to a transformer or other catastrophic event. Transformer oil spills will be immediately responded to following the spill response procedures in Section 4.0.

14.2.3 Fluid Recovery Tanks

Four underground fluid recovery collection tanks used to contain cutting oils that drain from the aluminum chip storage areas are located as follows: 1) 1,000-gallon capacity tank at the east end of the trench drain along the chip storage cover on the north side of the Main Building; 2) 1,000-gallon capacity tank at the south end of the trench drain along the chip storage cover at the northwest corner of the Main Building; 3) 1,000-gallon capacity tank at the east end of the trench drain along the Storage

Bins and vehicle dismantling area; and 4) 2,000-gallon capacity tank under the Chip Dryer Baghouse which serves as an oil/water separator for several drainage inlets located north of the vehicle dismantling structure. The oils contained in the three 1,000-gallon tanks consist primarily of water soluble cutting oils; however, other automotive related oils may also be present, particularly for the tank adjacent to the vehicle dismantling structure. The 2,000-gallon tank may contain some residual cutting oils from aluminum chips that fall on the asphalt during transfer. Additionally, this tank may contain residual automotive related oils from various activities that take place in the vicinity of these drainage inlets.

14.3 Areas of Potential Stormwater Contamination

The following potential source areas of stormwater contamination have been identified and evaluated:

Facility Parking Areas and Access Drives (DA-1 and DA-2)

The vehicles belonging to MARI and its employees, when not in use, are parked on-site within designated areas of the facility, primarily adjacent to the office on the southern portion of the facility. These vehicles enter/exit the site via the access roadway at the southeastern corner of the subject site that extends to Thompson Road. Trucks delivering scrap metal also enter/exit the site via this access road. Stormwater within these areas can be potentially contaminated by leaked automotive fluids and dirt/sediment. These contaminants may contain oil and grease, organic compounds and suspended solids.

Scrap Processing and Storage Areas (DA-1)

Scrap metal materials are segregated and placed onto piles in this area where they remain stored prior to being processed and/or shipped off-site for processing elsewhere. Materials are processed on-site in the yard outside the manufacturing building using portable crane-mounted shears and manual torch-cutting equipment. Stormwater from this area can be potentially contaminated by residues remaining on the scrap or by leaking heavy equipment. Additionally, trucks or vehicles entering and exiting the scrap area may track contaminants from the scrap processing and storage area onto the adjacent paved surfaces. These contaminants may contain metals, suspended solids, petroleum products or oil and grease.

Wet/Oily Aluminum Turnings/Chips Storage Areas (DA-1)

Oil soaked aluminum turnings/chips are stored under cover in four locations, including on the north side of the manufacturing building, on the west side of the manufacturing building adjacent to the Chip Dryer, in the structure used to dismantle vehicles, and in the large internal corridor within the manufacturing building. Oils which drain from these cuttings at any of the three locations flow into trench drains installed along the open side of each structure. The fluid flows into underground holding tanks located at the end of each drain. Potential exposure of aluminum turnings/chips from the covered storage areas can occur if these materials are spilled onto the asphalt surface when being placed into the covered storage

structures or when being transferred from the covered structures to the Chip Dryer loading area.

Maintenance Shop/Maintenance Storage (DA-1)

Petroleum products and other regulated substances used in the maintenance of the facility's vehicles and equipment (e.g., parts cleaner/solvent, spray paint, etc.) are stored in three locations, including the maintenance shop and adjoining room, the storage area near the non-ferrous scrap receiving area, and the storage structure near the pump house. The only potential for stormwater impact related to these materials is during outdoor transfer of the materials.

Facility Fueling Areas (DA-1 and DA-2)

Vehicles and equipment used by the facility are fueled using a diesel fuel dispenser located within the eastern portion of the site across from the non-ferrous scrap sorting area. The dispenser is attached to two aboveground storage tanks located adjacent to the dispenser, including a 1,000-gallon and a 2,000-gallon tank. These tanks are double-walled with a cover designed to prevent precipitation from entering the space between the tank and the containment wall. The tanks are re-filled as necessary by a contracted fuel supplier. Stormwater within these areas can be contaminated by leaks and minor spills of petroleum during fueling and/or tank filling. A catastrophic release of the 2,000-gallon tank would cause the contents of the tank to flow into a nearby drainage inlet which connects to the eastern drainage ditch at Outfall 002.

In addition to this diesel dispenser, a 250-gallon mobile diesel tank is stored in the vehicle dismantling area which is used to refuel the scrap processing equipment (i.e., shears, magnet, etc.). This fuel tank is moved around the processing area using a forklift. Stormwater within this area can be contaminated by leaks and minor spills of petroleum during heavy equipment operation, fueling and/or tank filling.

Waste Storage and Handling Areas (DA-1)

Scrap wood and refuse material generated at the facility are loaded into separate dumpster containers in the scrap processing area where they are stored prior to being picked up for off-site disposal. Stormwater within these areas may be contaminated by spilled or mishandled solid wastes. These contaminants may contain inert or biodegradable solids and oil and grease.

Auto Storage and Dismantling Area (DA-1)

Automobiles will be temporarily stored on-site on a paved surface prior to being moved into the vehicle dismantling structure located west of the main building, where they will be disassembled and drained of all fluids in preparation for transport off-site. Stormwater within these areas may be contaminated by leaked automotive fluids, including petroleum products and antifreeze, as well as heavy metal compounds.

Lime-Injected Baghouse Areas

The two lime-injected baghouses in use on-site are designed to capture particulate and acid gas emissions from the aluminum smelting operation in the manufacturing building. Spilled or mishandled particulate material removed from the baghouses during filter changes, maintenance or other tasks may impact stormwater within the area. These contaminants may contain metal compounds or may be corrosive.

Transformer Pad Areas

There are six areas of the facility that contain fluid-cooled electrical transformers, including: 1) main substation; 2) Blockhouse (aluminum shredder transformer (indoor)); 3) Buell Baghouse transformer area; 4) dryer transformer area; 5) Door No. 20 transformer area; and 6) pump house at the CAMU transformer area. The total volume of transformer oil at the facility is 2,684 gallons (Table 2). Stormwater that falls in any of the outdoor transformer areas could be impacted with transformer oils only in the event that the transformers leak or if fluid is spilled during maintenance procedures.

14.4 Sampling Data

As part of the special conditions set forth in MARI's SPDES Permit, the facility is required to complete both monthly and quarterly monitoring of its stormwater discharges. This monitoring is to be completed for both facility outfalls (Outfall 001 and 002). The specific monitoring requirements are listed on pages 3

and 4 of the SPDES Permit and discussed further in Section 16.0. Additionally, a short-term, high intensity monitoring program was required for the first three months following plumbing modifications made to Outfall 001 in October 2007. The analytical results for this monitoring were recorded on Discharge Monitoring Report (DMR) forms provided by the NYSDEC. Due to the volume of data, monitoring results and the associated field data are maintained in the MARI Manager's office.

15.0 Best Management Practices (BMPs)

A requirement of the facility's SPDES discharge permit, includes the development of a BMP Plan which documents the thirteen (13) minimum BMPs that are utilized at the facility to prevent the release of pollutants to State waters. In addition to implementing the BMPs listed below, MARI must conduct periodic facility reviews of the in-plant transfer, process, and material handling areas; material storage areas; loading and unloading operations; stormwater erosion and sediment control measures; process emergency control systems; and sludge and waste disposal areas. Appendix Q, O and N are attached for the weekly, monthly, and comprehensive annual facility BMP review, respectively.

This report was developed based on an initial Best Management Practices Plan developed by Hazard Evaluations, Inc. of Orchard Park, New York (November 2007). Many of the initial best management practices and information from the aforementioned report are incorporated herein as appropriate.

15.1 BMP Pollution Prevention Team

The pollution prevention team consists of a Team Coordinator, Secondary Coordinator, and team members that are responsible for developing, implementing, maintaining, and revising the BMPs. Appendix B lists facility contacts for the SPCC Emergency Coordinator and Alternate Emergency Coordinators. These contacts double as the BMP Pollution Prevention Team. The team members are all employees trained in pollution prevention. The EC and AEC will coordinate and mobilize the team as necessary. The EC is the point of contact for facility personnel and regulatory officials who wish to discuss the BMP Plan or obtain information concerning stormwater management. The EC is to be familiar with all phases of the facility operation so that potential

sources of pollution are considered during implementation and periodic evaluations of the plan.

15.2 Reporting of BMP Incidents

This BMP plan shall be updated whenever any failure of an existing BMP, or need for a new or additional BMP, is identified. This may occur during daily operations, as a result of any weekly, monthly, or annual site inspection, or in response to a spill or release of petroleum or hazardous substances, or other emergency. Both the change in BMP and the incident that precipitated the change shall be recorded using the form in Appendix G.

15.3 Risk Identification and Assessment

The potential for spills and/or stormwater impacts due to petroleum or other oil storage and use at the facility is discussed above in Section 3.0. Other possible impacts to stormwater and a brief assessment are outlined below:

1. Runoff from scrap metal storage areas:
 - All scrap metal storage areas are located within DA-1, which is to be equipped with a stormwater treatment system (per the IP).
2. Aluminum turnings migrating outside of storage areas or spilled when in transit between storages:
 - MARI contracts an independent street sweeper weekly and sweeps more often (as necessary) with the MARI owned sweeper during the non-winter months throughout the paved areas of the facility.

3. Smelting flux or other materials leaching from the storage bins:
 - A trench drain that leads to an underground holding tank captures all runoff from the storage bins.
4. Sediment, fluids, and solids tracked onto the site by vehicles delivering scrap metal:
 - MARI regularly sweeps the paved areas of the facility and as needed. MARI has also contracted a private sweeper to periodically sweep the facility.
5. Spills/leaks of petroleum fluids from heavy machinery;
 - Vehicles are inspected for leaks at the beginning of each shift, if leaks are observed they are fixed as soon as possible and/or the equipment is moved indoors (if possible) and a drip pan is placed to capture the leak.
6. Spills/leaks of petroleum fluids from maintenance to heavy machinery and equipment.
 - Equipment maintenance is performed indoors when possible, if not, proper drip collection pans and spill control equipment is maintained in order to capture a leak or spill.

MARI personnel are trained to identify other operations that have the potential to impact stormwater and will assess means for reducing the potential as they are identified.

15.4 Employee Training

Employees will receive periodic training on the goals and objectives of this BMP Plan. Training will occur at least annually and cover the topics identified on the Employee Training Sign-In Sheet and Agenda included in Appendix R. These topics generally include but are not limited to a review of potential sources of stormwater pollution, spill response, good housekeeping, and material handling practices with a focus on vehicle refueling and maintenance. Employees also receive detailed training on the handling of non-source separated materials; further detail concerning the content of this training is provided in Section 17.0. Training on erosion and sediment control is to be incorporated in facility training programs. A list of those who have attended the training is to be maintained at the facility and updated as additional training is performed.

15.5 Inspections and Records

Inspections and records include all inspections required for fulfillment of the SPCC requirements (see Sections 7.0 and 12.1), as well as weekly and monthly inspection records required as part of this BMP plan. Inspections must be completed by trained personnel. Weekly inspections must be documented using the form in Appendix Q, monthly inspections must be documented using Appendix O, and a comprehensive annual inspection must be documented using Appendix N as discussed in Section 7.0.

15.6 Security

See Section 9.0.

15.7 Good Housekeeping

Good housekeeping involves maintaining areas that could contribute pollutants to stormwater in a clean and orderly manner. This involves establishing routine and regular clean up procedures to include regular clean up of litter and establishing and maintaining well-organized work and supply storage areas.

Regular checks for scrap wood debris and other litter or refuse are performed, and such material is picked up and disposed in designated dumpsters as needed. Spilled or mishandled wastes will be cleaned up immediately and disposed of properly. Dust, sediment, and debris are swept up weekly both on paved and concrete areas outdoors as well as on indoor floor surfaces. More detail on the application of good housekeeping practices to specific operations areas is provided in Table 15-1.

15.8 Preventative Maintenance

Preventative maintenance involves timely inspection and maintenance of stormwater management devices such as the drainage swales, culvert pipes, earthen berms, and oil-water separators. In addition, facility equipment is to be maintained to limit the potential for conditions that could result in breakdowns leading to discharges of pollutants. A key element of Preventative Maintenance is the establishment of standardized inspection and recordkeeping procedures with documented follow up to ensure deficiencies are addressed. Details on application of this BMP to specific operations are found in Table 15-1.

15.9 Materials/Waste Handling, Storage, and Compatibility

Materials and waste storage and handling includes storage of materials indoors or in covered locations not exposed to stormwater whenever possible. Materials that are chemically reactive or present a hazard when mixed also must not be stored together or adjacent to each other. Details on application of this BMP to specific operations are found in Table 15-1.

15.10 Spill Prevention and Response

Routine training for staff in handling potential pollutants (i.e., fuels, oils, waste), to limit the potential for spills, is required. Detailed training requirements and procedures for delivery of oil and other petroleum fluids are provided in the Facility's SPCC Plan.

In the event of a spill, the spill response procedures identified in the SPCC Plan will be followed. Upon discovery or occurrence of **any** petroleum spill or release, employees **must** immediately contain and stop the spill and notify the Team Coordinator or Secondary Coordinator. The Team Coordinator or designee will be responsible for following the spill response procedures outlined in the SPCC.

A spill response kit will be located at each of the potential spill areas referenced in the SPCC plan, namely at the diesel fueling area, non-ferrous metals receiving area, chip storage area, Storage Bin No. 7, scrap processing area, and loading docks.

15.11 Erosion and Sediment Control

Erosion and sediment control practices on the site include ensuring that fresh gravel is applied on all unpaved lots and access drives, maintenance of ditch bank vegetation to prevent erosion, and mulching and vegetating all bare soil areas with grass cover.

15.12 Management of Runoff

Stormwater runoff from the site will be managed by directing flow from drainage area 1, which contains the highest concentrations of potential contaminants, to an oil-water separation device, which will remove oil and grease, metals, and suspended sediment. The structure will be located inline with the 15-inch culvert immediately upstream of Outfall 1, per the IP.

15.13 Street Sweeping

Paved areas are treated for metal and sediment particles via regular weekly sweeping. MARI also contracts a professional street sweeper to provide periodic sweeping as needed.

Table 15-1
Non-Structural and Structural Best Management Practices

Activity Area	Non-Structural BMP'S
Facility Fueling Areas (DA1, DA2)	<p>Structural BMPs: Hopper style aboveground double-walled diesel fuel tanks (1000-g and 2000-g) on concrete pad. Tanks are designed with an integral covered secondary containment designed to prevent precipitation from entering the space between the tank and outer wall. Portable 250-gallon diesel fuel tank are stored in the vehicle dismantling area.</p> <p>Housekeeping/Minimizing Exposure: Fueling activities are confined to designated fueling areas. An operator is present during vehicle fueling and fuel tanker unloading. Fuel delivery and unloading is supervised by facility staff.</p> <p>Routine Inspections/Preventive Maintenance: The fueling stations are inspected weekly by facility personnel. These inspections include a visual examination of all tanks, pump, piping for evidence of leaks, cracks or deterioration. If any leaks or damaged components are identified, they are repaired or replaced as soon as practicable.</p> <p>Spill Prevention and Response: See SPCC Plan, Sections 4.0 through 13.0 for detailed information and procedures. Spill kit is located at diesel tank fueling station. Practices that must be employed by the petroleum distributor include the following: 1) The capacity of the receiving tank is manually checked to ensure that the sufficient volume is available for the delivery; 2) Visual inspection of all hose connections are made prior to filling; 3) The vehicle is grounded to prevent an electrical spark; 4) The filling process is monitored carefully by driver in case of a malfunction; and 5) After filling, the delivery lines are cleared of fuel prior to disconnecting.</p> <p>Employee Training: Delivery of petroleum products is performed by independent petroleum distribution companies. These personnel are trained on proper delivery protocol and are responsible for safe delivery of the petroleum products according to industry standards and/or Department of Transportation regulations. Per IP, signs will be posted at the stationary facility fueling station and training instructing employees on the proper use of the fuel pump and appropriate spill response procedures.</p>

**Table 15-1
Non-Structural and Structural Best Management Practices**

Activity Area	Non-Structural BMP'S
Transformer Pad Areas	<p>Structural BMPs: Covered reservoirs present on all transformers.</p> <p>Housekeeping/Minimizing Exposure: Transformer fluids are to remain covered and unexposed at all times.</p> <p>Routine Inspections/Preventive Maintenance: Oil filled electrical transformers listed in Table 2 are inspected on a weekly basis as to fulfill SPCC requirements detailed in 40 CFR Part 112.7(k), given the transformers are not equipped with secondary containment. The transformers are each visually examined for signs of leakage and other damage. Any deficiencies are corrected immediately.</p> <p>Spill Prevention and Response: Spill response kits are located at the diesel fueling area, non-ferrous metals receiving area, chip storage area, Storage Bin No. 7, scrap processing area, and loading docks. The SPCC Plan (Sections 4.0 to 13.0) contains detailed information concerning spill response and prevention procedures.</p> <p>Employee Training: Employees are trained to inspect transformers weekly to ensure no damage, leaks, or other signs of failure, and to ensure that deficiencies are corrected immediately.</p>
Lime-Injected Baghouse Areas	<p>Structural BMPs: Baghouses located in enclosed area.</p> <p>Housekeeping/Minimizing Exposure: Spilled or mishandled particulate material removed from the baghouses during filter changes, maintenance or other tasks shall be cleaned up immediately to avoid impacts to stormwater within the area.</p> <p>Routine Inspections/Preventative Maintenance: Baghouses are inspected monthly to ensure that no conditions exist that would result in the release of particulate material. Any such deficiencies are corrected promptly, and any spilled material is immediately cleaned up.</p> <p>Spill Prevention and Response: Spill response kits are located at the diesel fueling area, non-ferrous metals receiving area, chip storage area, Storage Bin No. 7, scrap processing area, and loading docks. The SPCC Plan (Sections 4.0 to 13.0) contains detailed information concerning spill response and prevention procedures.</p> <p>Employee Training: Employees shall be trained on the proper methods for handling and disposing of baghouse fines.</p>

Table 15-1
Non-Structural and Structural Best Management Practices

Activity Area	Non-Structural BMP'S
Waste Storage and Handling Areas (DA1)	<p>Structural BMPs: Dumpster containers in the scrap processing area contain solid waste and remain covered when disposal activity is not ongoing. Any precipitation that falls on this area flows into drainage inlets equipped with inverted elbows for oil/water separation and absorbent pads.</p> <p>Housekeeping/Minimizing Exposure: When transferring materials into the dumpsters, care is taken by employees to ensure that all articles of waste are appropriately contained. Spilled or mishandled wastes will be cleaned up immediately and disposed of properly. The dumpsters will be emptied by a contracted waste disposal firm on a frequent basis to ensure they do not exceed their storage capacity. Dust, sediment, and debris are swept up weekly both on paved and concrete areas outdoors as well as on indoor floor surfaces.</p> <p>Routine Inspections/Preventive Maintenance: Regular checks for scrap wood debris and other litter or refuse are performed, and such material is picked up and disposed in designated dumpsters as needed. Waste storage and handling areas are included as part of the monthly and annual facility inspection program. Wastes, debris, or other contaminants discovered during the inspection are immediately cleaned up.</p> <p>Spill Prevention and Response: Oil spill response kits (spill kits) are located at the diesel fueling area, non-ferrous metals receiving area, chip storage area, Storage Bin No. 7, scrap processing area, and loading docks. The SPCC Plan (Sections 4.0 to 13.0) contains detailed information concerning spill response and prevention procedures.</p> <p>Employee Training: Employees are regularly trained on proper procedures for handling of scrap and waste material and the importance of ensuring that these materials are not exposed to stormwater.</p>
Wet or Oily Aluminum Turnings/Chips Storage Areas (DA1)	<p>Structural BMPs: Covered storage area.</p> <p>Housekeeping/Minimizing Exposure: All aluminum turnings and chips are stored in designated areas under cover. These areas will be kept in a neat and orderly manner, with daily inspections to ensure that no cutting fluids have migrated outside the trench drains.</p> <p>Routine Inspections/Preventive Maintenance: Tanks used to capture and collect drained cutting fluids are also inspected and maintained weekly to prevent overflow. Trench drains are also inspected weekly and maintained to ensure a clear and unobstructed flow path for fluids.</p> <p>Spill Prevention and Response: Oil spill response kits (spill kits) are located at the non-ferrous metals receiving area, chip storage area, Storage Bin No. 7, scrap processing area, and loading docks. The SPCC Plan (Sections 4.0 to 13.0) contains detailed information concerning spill response and prevention procedures.</p> <p>Employee Training: Employees are trained on the correct location in which to store aluminum turnings and chips, and to maintain these areas in orderly condition.</p>

<p align="center">Table 15-1 Non-Structural and Structural Best Management Practices</p>	
Activity Area	Non-Structural BMP'S
<p>Loading Docks</p>	<p>Structural BMPs: A trench drain is located along the dock entrance. Drain sends fluids to an underground storage tank. Fluids entering the drain can be contained in the pump house by manually shutting off the pump system.</p> <p>Housekeeping/Minimizing Exposure: Trench drain intercepts spilled or leaking fluids from incoming material.</p> <p>Routine Inspections/Preventive Maintenance: Loading dock areas are inspected daily for evidence of spills, accumulated debris, and materials exposed to stormwater. These conditions are corrected daily as necessary. Under ground fluid recovery tank is inspected daily to determine if pumpout is needed based on the level of fluid, and if so, the tank is promptly pumped out and fluid is disposed of by a licensed hauler.</p> <p>Spill Prevention and Response: Oil spill response kits (spill kits) are located at the diesel fueling area, non-ferrous metals receiving area, chip storage area, Storage Bin No. 7, scrap processing area, and loading docks. Trench drains intercept initial spills and direct fluid to underground storage tanks.</p> <p>Employee Training: Employees are trained in maintenance of loading dock area to avoid exposure of materials to precipitation and stormwater runoff.</p>
<p>Scrap Processing and Storage Areas (DA1)</p>	<p>Structural BMPs: Scrap metal is stored on concrete pads or in containers. Non-ferrous metals are stored indoors or in a covered area whenever practicable. Drainage inlets in the scrap storage area are equipped with an inverted elbow to provide limited oil-water separation. Oil absorbent pads are stored in the scrap yard drainage inlets, and are replaced every two days.</p> <p>Housekeeping/Minimizing Exposure: Outdoor storage of materials is avoided whenever possible. Storage containers are kept in good condition to minimize contact with stormwater. Scrap piles in the yard are visually monitored to ensure they do not exceed the height determined by local zoning law, thereby limiting the quantity of material that may be exposed to precipitation at one time.</p> <p>Routine Inspections/Preventive Maintenance: Equipment used in scrap processing is inspected at the beginning and end of each work day for leaking or damaged parts. Equipment is maintained on a routine basis in accordance with manufacturer recommendations, to prevent malfunction or leakage that could lead to stormwater contamination. Scrap storage area receives monthly inspections for spills, leaks, and excessive corrosion.</p> <p>Spill Prevention and Response: Spills or leaks of petroleum or other substances are immediately cleaned up in accordance with the SPCC Plan (Sections 4.0 to 13.0). Oil spill response kits (spill kits) are located at the diesel fueling area, non-ferrous metals receiving area, chip storage area, Storage Bin No. 7, scrap processing area, and loading docks.</p> <p>Employee Training: Employees receive training on the proper procedures for storing materials.</p>

**Table 15-1
Non-Structural and Structural Best Management Practices**

Activity Area	Non-Structural BMP'S
Maintenance Shop/Maintenance Storage (DA1)	<p>Structural BMPs: Enclosed Maintenance Building. Indoor tanks and drums are located on secondary containment.</p> <p>Housekeeping/Minimizing Exposure: The floor inside the shop is cleaned (swept and/or washed) as needed. All batteries, motor oil, automotive fluids, and other regulated materials will be stored inside the facility when practicable to prevent their exposure to precipitation. Used parts will be placed into non-leaking containers immediately upon removal from their vehicles/equipment to ensure that any residual fluids or grease present on these parts is contained. No solvents, detergents, wash water or other fluids will be poured down drains or spilled in catchbasins or on outdoor surfaces.</p> <p>Routine Inspections/Preventive Maintenance: Areas and containers used for the storage of regulated substances will be inspected monthly.</p> <p>Spill Prevention and Response: During the use storage and handling of potential contaminants, caution will be exercised to prevent releases of the substances to the environment. For discarded fluids, the fluid level inside the waste oil storage tank is monitored by facility personnel placing oil into the tank. The tank will be emptied (pumped-out) as necessary. Any spills discovered during weekly inspections will be immediately cleaned up. Spill kits are present at all times in maintenance shop.</p> <p>Employee Training: Employees are trained to perform the routine inspections and preventative maintenance procedures noted above.</p>
Facility Parking Areas and Access Drives (DA1)	<p>Structural BMPs: Pavement stabilized parking area, grassed and stone-lined swales, etc.</p> <p>Housekeeping/Minimizing Exposure: The main access drive is swept or scraped to remove accumulated sediment and debris on at minimum, a monthly basis. Vehicle parking is restricted to designated parking areas. If leaking vehicles are discovered, drip pans are placed beneath them immediately to collect fluids. No solvents, detergents, wash water or other fluids will be allowed to discharge to the on-site storm sewer system or onto the ground surface.</p> <p>Routine Inspections/Preventative Maintenance: Parking areas and vehicles are inspected monthly and maintained as necessary to remove and dispose of any spills, wastes, or debris.</p> <p>Spill Prevention and Response: Oil spill response kits (spill kits) are located at the diesel fueling area, non-ferrous metals receiving area, chip storage area, Storage Bin No. 7, scrap processing area, and loading docks.</p> <p>Employee Training: Employees are trained to regularly inspect vehicles and parking areas. Employees are also trained in the proper procedures for reporting vehicle problems, spill reporting, etc.</p>

Table 15-1
Non-Structural and Structural Best Management Practices

Activity Area	Non-Structural BMP'S
Stormwater Drainage System	<p>Structural BMPs: Oil-water separator or equivalent device (per IP), drains with inverted elbows to allow partial oil-water separation.</p> <p>Housekeeping/Minimizing Exposure: Areas that drain to catchbasins and trench drains are swept and kept free of sediment and debris regularly to reduce the quantity of material entering drainage structures.</p> <p>Routine Inspections/Preventative Maintenance: Stormwater catchbasins, trench drains, and outfalls are inspected weekly for accumulation of sludge, sediment and debris. If accumulation of these materials exceeds 50 percent of the capacity of the structure, materials shall be removed.</p> <p>Spill Prevention and Response: Oil spill response kits (spill kits) are located at the diesel fueling area, non-ferrous metals receiving area, chip storage area, Storage Bin No. 7, scrap processing area, and loading docks.</p> <p>Employee Training: Employees are trained to regularly inspect drainage structures, including trench drains, catchbasins, outfalls, and the oil-water separation unit.</p>

Appendices

Appendix A
Applicability of Substantial Harm Criteria

Appendix A
Substantial Harm Criteria Checklist (40 CFR 112.20 (E))
Certification of Applicability

FACILITY NAME: Metalico Aluminum Recovery, Inc. – Facility No. 7102372
FACILITY ADDRESS: 6223 Thompson Road
Syracuse, New York 13206

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

Yes _____ No X

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?

Yes _____ No X

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?

Yes _____ No X

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility would shut down a public drinking water intake?

Yes _____ No X

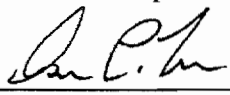
5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

Yes _____ No X

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Ian C. Toevs
Name (please type or print)
Engineer II
Title


Signature
8/27/2008
Date

Appendix B
Facility Contacts

Appendix B

Facility Contacts

Metalico Aluminum Recovery, Inc.
Facility No. 7102372
January 2009 - Update as Necessary

Name	Contact Numbers	
Emergency Coordinator		
Dennis Flanagan	Office	(315) 463-9500 ext. 208
General Manager	Cell	(315) 372-1087
Alternate Emergency Coordinators		
Jim Brady	Office	(315) 463-9500 ext. 205
	Cell	(315) 383-9819
Bill Eibert	Office	(315) 463-9500 ext. 213
Maintenance Supervisor	Cell	(315) 374-1507
Burt Coleman	Office	(315) 463-9500 ext. 217
Special Projects Manager	Cell	(315) 480-1918
Team Members		
Mike Van Camp	Office	(315) 463-9500 ext. 203
Scrap Operations Manager		
John Winchell	Office	(315) 463-9500 ext. 213
Lead Technician		

Appendix C
Spill History Summary

Appendix C Spill History Summary

Spill Number	Date	Material and Quantity Spilled	Cause	Resource Affected	Spill Response	Date Closed
No Spills on Record	8/26/2008					

Note: Summary covers only last five years of spill history.

Appendix D
NYSDEC PBS Registration Certificate



New York State Department of Environmental Conservation
PETROLEUM BULK STORAGE CERTIFICATE

Region 7 NYDEC - PBS Unit
615 Erie Boulevard West
Syracuse, NY 13204-2400
(315) 426-7519

625 Broadway, 11th Floor, Albany, NY 12233-7020 Phone: 518-402-9553

TANK NUMBER	TANK LOCATION	DATE INSTALLED	TANK TYPE	CAPACITY (GALLONS)	DATE LAST TESTED	TESTING DUE DATE
101	Aboveground on crib, rack, or cradle	07/05/2006	Steel/Carbon Steel/Iron	1,000		*
102	Aboveground on crib, rack, or cradle	07/05/2006	Steel/Carbon Steel/Iron	2,000		*

* Aboveground tanks require monthly visual inspections and may need documented internal inspections as described in 6 NYCRR Part 613

OWNER:
CARLOS AQUERO
106 NORTH AVE. E.
CRANSFORD, NJ 07016

OPERATOR: JON MARANTZ

(315) 463-9500

EMERGENCY: JON MARANTZ

CONTACT: (315) 677-9732

ISSUED BY: Commissioner
Denise M. Sheehan
PBS NUMBER: 7-437999
DATE ISSUED: 07/05/2006
EXPIRATION DATE: 07/05/2011
FEE PAID: \$300.00

SITE:
METALICO ALUMINUM RECOVERY INC.
6223 THOMPSON RD.
E. SYRACUSE, NY 13057

MAILING CORRESPONDENCE:

JON MARANTZ
METALICO ALUMINUM RECOVERY INC.
6223 THOMPSON RD.
P.O. BOX 88
E. SYRACUSE, NY 13057

As an authorized representative of the above named facility, I affirm under penalty of perjury that the information displayed on this form is correct to the best of my knowledge. Additionally, I recognize that I am responsible for assuring that this facility is in compliance with all sections of 6 NYCRR Parts 612, 613 and 614, and applicable sections of 6 NYCRR Subpart 360-14 (used oil tanks only), not just those cited below:

- The facility must be re-registered if there is a transfer of ownership.
- The Department must be notified within 30 days prior to adding, replacing, reconditioning, or permanently closing a stationary tank.
- The facility must be operated in accordance with the code for storing petroleum, 6 NYCRR Part 613.
- Any new facility or substantially modified facility must comply with 6 NYCRR Part 614.

This certificate must be signed and posted on the premises at all times. Posting must be at the tank, at the entrance of the facility, or the main office where the storage tanks are located.

-- Any person with knowledge of a spill, leak or discharge must report the incident to DEC within two hours (1-800-457-7362).

Signature of Representative/ Owner: *Jon Marantz* Date: *JULY 6/06*

General Manager: *Jon Marantz* Name and Title of Authorized Representative/Owner (Please Print)

Appendix E

Facility Capacity Calculations

Appendix E
Metalico Aluminum Recovery, Inc.
Facility No. 7102372
Facility Oil Storage Capacity
Updated August 2008

Bulk Storage Tanks

SPCC ID Number	Location	Type	Product Stored	Capacity (Gal)
101	Near Facility Entrance	AST - Hopper Style	Diesel Fuel	1,000
102	Near Facility Entrance	AST - Hopper Style	Diesel Fuel	2,000
104	Storage Bin No. 7	AST - Portable (used as stationary)	Used Oil	300
AD-1	Storage Bin No. 7	AST on Auto-Dismantler	Used Oil	180
AD-2	Storage Bin No. 7	AST on Auto-Dismantler	Used Oil	180
AD-3	Storage Bin No. 7	AST on Auto-Dismantler	Used Oil (Used Gasoline)	180
Subtotal =				3,840

Portable Storage Tanks & Drums

SPCC ID Number	Location	Type	Product Stored	Capacity (Gal)
103	Storage Bin No. 7	AST - Portable	Diesel Fuel	250
Subtotal =				250

55-Gallon Drum Storage

SPCC ID Number	Location	Number Stored*	Product Stored	Capacity (Gal)
D-1	Maintenance Area (Main Bldg.)	6	Various New Oils	330
D-2	Aluminum Shredder (Main Bldg.)	2	Used Oil	110
D-3	Storage Bin No. 7	6	Various New and Used Oils	330
Total Number of Drums* =		14	Subtotal =	770

Oil-Filled Operational Equipment

SPCC ID Number	Location	Type	Product Stored	Capacity (Gal)
OFT-1	Main Substation	5,000 KVA Electrical Transformer	Electrical Cooling Oil	674
OFT-2	Main Substation	3,750 KVA Electrical Transformer	Electrical Cooling Oil	564
OFT-3	Aluminum Shredder (Main Bldg.)	500 KVA Electrical Transformer	Electrical Cooling Oil	303
OFT-4	Buell Baghouse Transformer Area	333 KVA Electrical Transformer	Electrical Cooling Oil	91
OFT-5	Buell Baghouse Transformer Area	333 KVA Electrical Transformer	Electrical Cooling Oil	91
OFT-6	Buell Baghouse Transformer Area	333 KVA Electrical Transformer	Electrical Cooling Oil	91
OFT-7	Dryer Transformer Area	250 KVA Electrical Transformer	Electrical Cooling Oil	77
OFT-8	Dryer Transformer Area	250 KVA Electrical Transformer	Electrical Cooling Oil	77
OFT-9	Dryer Transformer Area	250 KVA Electrical Transformer	Electrical Cooling Oil	77
OFT-10	Dryer Transformer Area	167 KVA Electrical Transformer	Electrical Cooling Oil	78
OFT-11	Dryer Transformer Area	167 KVA Electrical Transformer	Electrical Cooling Oil	78
OFT-12	Dryer Transformer Area	167 KVA Electrical Transformer	Electrical Cooling Oil	78
OFT-13	Door #20 Transformer Area	167 KVA Electrical Transformer	Electrical Cooling Oil	57
OFT-14	Door #20 Transformer Area	167 KVA Electrical Transformer	Electrical Cooling Oil	57
OFT-15	Door #20 Transformer Area	167 KVA Electrical Transformer	Electrical Cooling Oil	57
OFT-16	Metal Shed at CAMU Area	167 KVA Electrical Transformer	Electrical Cooling Oil	78
OFT-17	Metal Shed at CAMU Area	167 KVA Electrical Transformer	Electrical Cooling Oil	78
OFT-18	Metal Shed at CAMU Area	167 KVA Electrical Transformer	Electrical Cooling Oil	78
Subtotal =				2,684

Facility Total = 7,544

* Maximum number stored. The actual quantity may vary based on inventory

Appendix F
Material Safety Data Sheets (MSDS)

Service Pro Premium Hydraulic Oil A/W 68

Material Safety Data Sheet

Association of Independent Oil Distributors
P.O. Box 1861
Montrose, CO 81402-1861

MSDS No. 633430386097

Revision Date 04/19/2005

IMPORTANT: Read this MSDS before handling or disposing of this product and pass this information on to employees, customers and users of this product.

Emergency Overview

Physical State Liquid.

Color Light amber to amber. Odor Mild petroleum odor

WARNING!

Oil injected into the skin from high-pressure leaks in hydraulic systems can cause severe injury.

Seek medical attention immediately.

Surgical removal of oil may be necessary.

Spills may create a slipping hazard.

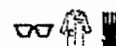
Hazard Rankings

	HMIS	NFPA
Health Hazard	1	0
Fire Hazard	1	1
Reactivity	0	0

* = Chronic Health Hazard

PROTECTIVE EQUIPMENT

Minimum Recommended
See Section 8 for Details



SECTION 1: IDENTIFICATION

Trade Name	Service Pro Premium Hydraulic Oil A/W 68	Technical Contact	(800) 313-2463
Product Number	633430386097		
CAS Number	Mixture.	Medical Emergency	(800) 313-2463
Product Family	Hydraulic oil		
Synonyms	Hydraulic oil; Service Pro SAP Product Code No.: 633430386097	CHEMTREC Emergency (United States Only)	(800) 424-9300

SECTION 2: COMPOSITION

Component Name(s)	CAS Registry No.	Concentration (%)
1) Distillates, petroleum, solvent-refined heavy paraffinic	64741-88-4	98 - 100
2) Proprietary Ingredients	Proprietary Mixture	0 - 2
3) Zinc alkyldithiophosphate	68649-42-3	0 - 1

SECTION 3: HAZARDS IDENTIFICATION

Also see Emergency Overview and Hazard Ratings on the top of Page 1 of this MSDS.

Major Route(s) of Entry Skin contact.

Signs and Symptoms of Acute Exposure

Inhalation At elevated temperatures or in enclosed spaces, product mist or vapors may irritate the mucous membranes of the nose, the throat, bronchi, and lungs.

Eye Contact This material can cause mild eye irritation from contact with product or product mists.

Skin Contact This material can cause mild skin irritation from prolonged or repeated skin contact. Injection under the skin can cause inflammation and swelling. Injection of pressurized hydrocarbons can cause severe, permanent tissue damage. Initial symptoms may be minor. Injection of petroleum hydrocarbons requires immediate medical attention.

Service Pro Premium Hydraulic Oil A/W 68

Ingestion	If swallowed, large volumes of material can cause generalized depression, headache, drowsiness, nausea, vomiting and diarrhea. Smaller doses can cause a laxative effect. If aspirated into the lungs, liquid can cause lung damage.
Chronic Health Effects Summary	Contains a petroleum-based mineral oil. Prolonged or repeated skin contact can cause mild irritation and inflammation characterized by drying, cracking, (dermatitis) or oil acne. Repeated or prolonged inhalation of petroleum-based mineral oil mists at concentrations above applicable workplace exposure levels can cause respiratory irritation or other pulmonary effects.
Conditions Aggravated by Exposure	Medical conditions aggravated by exposure to this material may include pre-existing skin disorders.
Target Organs	This material may cause damage to the following organs: skin.
Carcinogenic Potential	This product does not contain any components at concentrations above 0.1% which are considered carcinogenic by OSHA, IARC or NTP.

OSHA Hazard Classification is indicated by an "X" in the box adjacent to the hazard title. If no "X" is present the product does not exhibit the hazard as defined in the OSHA Hazard Communication Standard (29 CFR 1910.1200).

OSHA Health Hazard Classification		OSHA Physical Hazard Classification			
Irritant <input type="checkbox"/>	Toxic <input type="checkbox"/>	Combustible <input type="checkbox"/>	Explosive <input type="checkbox"/>	Pyrophoric <input type="checkbox"/>	
Sensitizer <input type="checkbox"/>	Highly Toxic <input type="checkbox"/>	Flammable <input type="checkbox"/>	Oxidizer <input type="checkbox"/>	Water-reactive <input type="checkbox"/>	
Corrosive <input type="checkbox"/>	Carcinogenic <input type="checkbox"/>	Compressed Gas <input type="checkbox"/>	Organic Peroxide <input type="checkbox"/>	Unstable <input type="checkbox"/>	

SECTION 4: FIRST AID MEASURES

Take proper precautions to ensure your own health and safety before attempting rescue or providing first aid. For more specific information, refer to Exposure Controls and Personal Protection in Section 8 of this MSDS.

Inhalation	Move victim to fresh air. If victim is not breathing, immediately begin rescue breathing. If breathing is difficult, 100 percent humidified oxygen should be administered by a qualified individual. Seek medical attention immediately. Keep the affected individual warm and at rest.
Eye Contact	Check for and remove contact lenses. Flush eyes with cool, clean, low-pressure water while occasionally lifting and lowering eyelids. Seek medical attention if excessive tearing, redness, or pain persists.
Skin Contact	If burned by hot material, cool skin by quenching with large amounts of cool water. Remove contaminated shoes and clothing. Wipe off excess material. Wash exposed skin with mild soap and water. Seek medical attention if tissue appears damaged or if pain or irritation persists. Thoroughly clean contaminated clothing before reuse. Discard contaminated leather goods. If material is injected under the skin, seek medical attention immediately.
Ingestion	Do not induce vomiting unless directed to by a physician. Do not give anything to drink unless directed to by a physician. Never give anything by mouth to a person who is not fully conscious. Seek medical attention immediately.
Notes to Physician	In the event of injection in underlying tissue, immediate treatment should include extensive incision, debridement and saline irrigation. Inadequate treatment can result in ischemia and gangrene. Early symptoms may be minimal.

SECTION 5: FIRE FIGHTING MEASURES

NFPA Flammability Classification NFPA Class-IIIB combustible material. Slightly combustible!

Flash Point Method OPEN CUP: 242°C (468°F) (Cleveland).

Lower Flammable Limit	No data.	Upper Flammable Limit	No data.
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Autoignition Temperature Not available.

Service Pro Premium Hydraulic Oil A/W 68

Hazardous Combustion Products	Carbon dioxide, carbon monoxide, smoke, fumes, unburned hydrocarbons, and trace oxides of sulfur, phosphorus, zinc and/or nitrogen.
Special Properties	This material can burn but will not readily ignite. This material will release vapors when heated above the flash point temperature that can ignite when exposed to a source of ignition. In enclosed spaces, heated vapor can ignite with explosive force. Mists or sprays may burn at temperatures below the flash point.
Extinguishing Media	Use dry chemical, foam, Carbon Dioxide or water fog.
Protection of Fire Fighters	Firefighters must use full bunker gear including NIOSH-approved positive pressure self-contained breathing apparatus to protect against potential hazardous combustion or decomposition products and oxygen deficiencies.

SECTION 6: ACCIDENTAL RELEASE MEASURES

Take proper precautions to ensure your own health and safety before attempting spill control or clean-up. For more specific information, refer to the Emergency Overview on Page 1, Exposure Controls and Personal Protection in Section 8 and Disposal Considerations in Section 13 of this MSDS.

Do not touch damaged containers or spilled material unless wearing appropriate protective equipment. Slipping hazard; do not walk through spilled material. Stop leak if you can do so without risk. For small spills, absorb or cover with dry earth, sand, or other inert non-combustible absorbent material and place into waste containers for later disposal. Contain large spills to maximize product recovery or disposal. Prevent entry into waterways or sewers. In urban area, cleanup spill as soon as possible. In natural environments, seek cleanup advice from specialists to minimize physical habitat damage. This material will float on water. Absorbent pads and similar materials can be used. Comply with all laws and regulation.

SECTION 7: HANDLING AND STORAGE

Handling	Avoid contamination and extreme temperatures to minimize product degradation. Empty containers may contain product residues that can ignite with explosive force. Do not pressurize, cut, weld, braze solder, drill, grind or expose containers to flames, sparks, heat or other potential ignition sources. Consult appropriate federal, state and local authorities before reusing, reconditioning, reclaiming, recycling or disposing of empty containers and/or waste residues of this product.
Storage	Keep container closed. Do not store with strong oxidizing agents. Do not store at temperatures above 120° F or in direct sunlight for extended periods of time. Consult appropriate federal, state and local authorities before reusing, reconditioning, reclaiming, recycling or disposing of empty containers or waste residues of this product.

SECTION 8: EXPOSURE CONTROLS AND PERSONAL PROTECTION

Engineering Controls	Provide exhaust ventilation or other engineering controls to keep the airborne concentrations of mists and/or vapors below the recommended exposure limits (see below). An eye wash station and safety shower should be located near the work-station.
Personal Protective Equipment	Personal protective equipment should be selected based upon the conditions under which this material is used. A hazard assessment of the work area for PPE requirements should be conducted by a qualified professional pursuant to OSHA regulations. The following pictograms represent the minimum requirements for personal protective equipment. For certain operations, additional PPE may be required.



Eye Protection	Safety glasses equipped with side shields are recommended as minimum protection in industrial settings. Wear goggles and/or face shield if splashing or spraying is anticipated. Wear goggles and face shield if material is heated above 125°F (51°C). Have suitable eye wash water available.
Hand Protection	Use gloves constructed of chemical resistant materials such as neoprene or heavy nitrile rubber if frequent or prolonged contact is expected. Use heat-protective gloves when handling product at elevated temperatures.

Service Pro Premium Hydraulic Oil A/W 68

Body Protection	Use clean and impervious protective clothing (e.g., neoprene or Tyvek®) if splashing or spraying conditions are present. Protective clothing may include long-sleeve outer garment, apron, or lab coat. If significant contact occurs, remove oil-contaminated clothing as soon as possible and promptly shower. Launder contaminated before reuse or discard. Wear heat protective boots and protective clothing when handling material at elevated temperatures.
Respiratory Protection	Vaporization is not expected at ambient temperatures. Therefore, the need for respiratory protection is not anticipated under normal use conditions and with adequate ventilation. If elevated airborne concentrations above applicable workplace exposure levels are anticipated, a NIOSH-approved organic vapor respirator equipped with a dust/mist prefilter should be used. Protection factors vary depending upon the type of respirator used. Respirators should be used in accordance with OSHA requirements (29 CFR 1910.134).
General Comments	Use good personal hygiene practices. Wash hands and other exposed skin areas with plenty of mild soap and water before eating, drinking, smoking, use of toilet facilities, or leaving work. DO NOT use gasoline, kerosene, solvents or harsh abrasives as skin cleaners. Since specific exposure standards/control limits have not been established for this product, the "Oil Mist, Mineral" exposure limits shown below are suggested as minimum control guidelines.

Occupational Exposure Guidelines

Substance

1) Oil Mist, Mineral

Applicable Workplace Exposure Levels

ACGIH (United States).

TWA: 5 mg/m³

STEL: 10 mg/m³

OSHA (United States).

TWA: 5 mg/m³

SECTION 9: PHYSICAL AND CHEMICAL PROPERTIES

Physical State	Liquid.	Color	Light amber to amber.	Odor	Mild petroleum odor
Specific Gravity	0.88 (Water = 1)	pH	Not Applicable.	Vapor Density	>1 (Air = 1)
Boiling Point/Range	Not available.			Melting/Freezing Point	Not available.
Vapor Pressure	<0.001 kPa (<0.01 mmHg) (at 20°C).			Viscosity (cSt @ 40°C)	69.
Solubility in Water	Insoluble in cold water.			Volatile Characteristics	Negligible volatility
Additional Properties	Gravity, °API (ASTM D287) = 29.3 @ 60° F Density = 7.33 Lbs/gal Viscosity (ASTM D2161) = 358 SUS @ 100° F				

SECTION 10: STABILITY AND REACTIVITY

Chemical Stability	Stable.	Hazardous Polymerization	Not expected to occur.
Conditions to Avoid	Keep away from extreme heat, sparks, open flame, and strongly oxidizing conditions.		
Materials Incompatibility	Strong oxidizers.		
Hazardous Decomposition Products	No additional hazardous decomposition products were identified other than the combustion products identified in Section 5 of this MSDS.		

SECTION 11: TOXICOLOGICAL INFORMATION

For other health-related information, refer to the Emergency Overview on Page 1 and the Hazards Identification in Section 3 of this MSDS.

Service Pro Premium Hydraulic Oil A/W 68

Toxicity Data **Distillates, petroleum, solvent-refined heavy paraffinic:**
ORAL (LD50): Acute: >5000 mg/kg [Rat].
DERMAL (LD50): Acute: >2000 mg/kg [Rabbit].

Distillates, petroleum, solvent-refined heavy paraffinic:

Mineral oil mists derived from highly refined oils are reported to have low acute and sub-acute toxicities in animals. Effects from single and short-term repeated exposures to high concentrations of mineral oil mists well above applicable workplace exposure levels include lung inflammatory reaction, lipoid granuloma formation and lipoid pneumonia. In acute and sub-acute studies involving exposures to lower concentrations of mineral oil mists at or near current work place exposure levels produced no significant toxicological effects. In long term studies (up to two years) no carcinogenic effects have been reported in any animal species tested. Analyses conducted by method IP 346 indicate that the polycyclic aromatic concentration of this mineral oil is below 3.0 weight percent.

Hydraulic Oils:

Repeated or prolonged skin contact with certain hydraulic oils can cause mild skin irritation characterized by drying, cracking (dermatitis) or oil acne. Injection under the skin, in muscle or into the blood stream can cause irritation, inflammation, swelling, fever, and systemic effects, including mild central nervous system depression. Injection of pressurized hydrocarbons can cause severe, permanent tissue damage.

SECTION 12: ECOLOGICAL INFORMATION

Ecotoxicity Analysis for ecological effects has not been conducted on this product. However, if spilled, this product and any contaminated soil or water may be harmful to human, animal, and aquatic life. Also, the coating action associated with petroleum and petroleum products can be harmful or fatal to aquatic life and waterfowl.

Environmental Fate An environmental fate analysis has not been conducted on this specific product. Plants and animals may experience harmful or fatal effects when coated with petroleum-based products. Petroleum-based (mineral) lube oils will normally float on water. In stagnant or slow-flowing waterways, an oil layer can cover a large surface area. As a result, this oil layer might limit or eliminate natural atmospheric oxygen transport into the water. With time, if not removed, oxygen depletion in the waterway can result in a loss of marine life or create an anaerobic environment. This material contains phosphorus which is a controlled element for disposal in effluent waters in most sections of North America. Phosphorus is known to enhance the formation of algae. Severe algae growth can reduce oxygen content in the water possibly below levels necessary to support marine life.

SECTION 13: DISPOSAL CONSIDERATIONS

Hazard characteristic and regulatory waste stream classification can change with product use. Accordingly, it is the responsibility of the user to determine the proper storage, transportation, treatment and/or disposal methodologies for spent materials and residues at the time of disposition.

Conditions of use may cause this material to become a "hazardous waste", as defined by federal or state regulations. It is the responsibility of the user to determine if the material is a "hazardous waste" at the time of disposal. Transportation, treatment, storage, and disposal of waste material must be conducted in accordance with RCRA regulations (see 40 CFR 260 through 40 CFR 271). State and/or local regulations may be more restrictive. Contact the RCRA/Superfund Hotline at (800) 424-9346 or your regional US EPA office for guidance concerning case specific disposal issues. Empty drums and pails retain residue. DO NOT pressurize, cut, weld, braze, solder, drill, grind, or expose this product's empty container to heat, flame, or other ignition sources. DO NOT attempt to clean it. Empty drums and pails should be drained completely, properly bunged or sealed, and promptly sent to a reconditioner.

SECTION 14: TRANSPORT INFORMATION

DOT Status Not a U.S. Department of Transportation regulated material.

Proper Shipping Name Not regulated.


Hazard Class Not regulated.

Packing Group(s) Not applicable.

UN/NA ID Not regulated.

Service Pro Premium Hydraulic Oil A/W 68

Reportable Quantity A Reportable Quantity (RQ) has not been established for any components of this material.

Placards  **Emergency Response Guide No.** Not applicable.

HAZMAT STCC No. Not assigned.

MARPOL III Status Not a DOT "Marine Pollutant" per 49 CFR 171.8.

SECTION 15: REGULATORY INFORMATION

TSCA Inventory This product and/or its components are listed on the Toxic Substances Control Act (TSCA) inventory.

SARA 302/304 The Superfund Amendments and Reauthorization Act of 1986 (SARA) Title III requires facilities subject to Subparts 302 and 304 to submit emergency planning and notification information based on Threshold Planning Quantities (TPQs) and Reportable Quantities (RQs) for "Extremely Hazardous Substances" listed in 40 CFR 302.4 and 40 CFR 355. No components were identified.

SARA 311/312 The Superfund Amendments and Reauthorization Act of 1986 (SARA) Title III requires facilities subject to this subpart to submit aggregate information on chemicals by "Hazard Category" as defined in 40 CFR 370.2. This material would be classified under the following hazard categories: No SARA 311/312 hazard categories identified.

SARA 313 This product contains the following components in concentrations above de minimis levels that are listed as toxic chemicals in 40 CFR Part 372 pursuant to the requirements of Section 313 of SARA: No components were identified.

CERCLA The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) requires notification of the National Response Center concerning release of quantities of "hazardous substances" equal to or greater than the reportable quantities (RQs) listed in 40 CFR 302.4. As defined by CERCLA, the term "hazardous substance" does not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically designated in 40 CFR 302.4. Chemical substances present in this product or refinery stream that may be subject to this statute are: Zinc and Zinc Compounds, Concentration: 0 - 1%.

CWA This material is classified as an oil under Section 311 of the Clean Water Act (CWA) and the Oil Pollution Act of 1990 (OPA). Discharges or spills which produce a visible sheen on waters of the United States, their adjoining shorelines, or into conduits leading to surface waters must be reported to the EPA's National Response Center at (800) 424-8802.

California Proposition 65 This material may contain the following components which are known to the State of California to cause cancer, birth defects or other reproductive harm, and may be subject to the requirements of California Proposition 65 (CA Health & Safety Code Section 25249.5): Toluene: 0.0008%; Ethyl Acrylate: 0.0002%; Propylene oxide: 0.0001%.

New Jersey Right-to-Know Label Petroleum Oil (Hydraulic Oil)

Additional Regulatory Remarks No additional regulatory remarks.

SECTION 16: OTHER INFORMATION

Refer to the top of Page 1 for the HMIS and NFPA Hazard Ratings for this product.

REVISION INFORMATION

Version Number 3.1
Revision Date 04/19/2005
Print Date Printed on 04/19/2005.

Service Pro Premium Hydraulic Oil A/W 68

ABBREVIATIONS

AP: Approximately	EQ: Equal	>: Greater Than	<: Less Than	NA: Not Applicable	ND: No Data	NE: Not Established
ACGIH: American Conference of Governmental Industrial Hygienists				AIHA: American Industrial Hygiene Association		
IARC: International Agency for Research on Cancer				NTP: National Toxicology Program		
NIOSH: National Institute of Occupational Safety and Health				OSHA: Occupational Safety and Health Administration		
NPCA: National Paint and Coating Manufacturers Association				HMIS: Hazardous Materials Information System		
NFPA: National Fire Protection Association				EPA: US Environmental Protection Agency		

DISCLAIMER OF LIABILITY

THE INFORMATION IN THIS MSDS WAS OBTAINED FROM SOURCES WHICH WE BELIEVE ARE RELIABLE. HOWEVER, THE INFORMATION IS PROVIDED WITHOUT ANY WARRANTY, EXPRESSED OR IMPLIED REGARDING ITS CORRECTNESS. SOME INFORMATION PRESENTED AND CONCLUSIONS DRAWN HEREIN ARE FROM SOURCES OTHER THAN DIRECT TEST DATA ON THE SUBSTANCE ITSELF. THIS MSDS WAS PREPARED AND IS TO BE USED ONLY FOR THIS PRODUCT. IF THE PRODUCT IS USED AS A COMPONENT IN ANOTHER PRODUCT, THIS MSDS INFORMATION MAY NOT BE APPLICABLE. USERS SHOULD MAKE THEIR OWN INVESTIGATIONS TO DETERMINE THE SUITABILITY OF THE INFORMATION OR PRODUCTS FOR THEIR PARTICULAR PURPOSE.

THE CONDITIONS OR METHODS OF HANDLING, STORAGE, USE, AND DISPOSAL OF THE PRODUCT ARE BEYOND OUR CONTROL AND MAY BE BEYOND OUR KNOWLEDGE. FOR THIS AND OTHER REASONS, WE DO NOT ASSUME RESPONSIBILITY AND EXPRESSLY DISCLAIM LIABILITY FOR LOSS, DAMAGE OR EXPENSE ARISING OUT OF OR IN ANY WAY CONNECTED WITH HANDLING, STORAGE, USE OR DISPOSAL OF THE PRODUCT.

***** END OF MSDS *****



GRAYMONT

MATERIAL SAFETY DATA SHEET

SECTION I - CHEMICAL PRODUCT AND COMPANY INFORMATION

Material Name / Identifier: **HYDRATED LIME****WHMIS CLASS E : CORROSIVE MATERIAL**

MANUFACTURER'S AND SUPPLIER'S NAME:

GRAYMONT (NB) INC

4634, Route 880, Havelock, New Brunswick, E4Z 5K8.

GRAYMONT (QC) INC.

25, rue De Lauzon, Boucherville (Québec), J4B 1E7.

GRAYMONT (PA) INC.

965, East College avenue, Pleasant Gap, PA 16823

GRAYMONT (WESTERN CANADA) INC.

190 - 3025, 12 Street N.E., Calgary, Alberta, T2E 7J2

GRAYMONT (WESTERN US) INC.

3950 South, 700 East, Suite 301, Salt Lake City, Utah 84107

EMERGENCY TEL. No.: (613) 996 - 6666 CANUTEC (Canada) (800) 424 - 9300 CHEMTREC (US)

Chemical Name	Chemical Family	Chemical Formula
Calcium hydroxide	Alkaline earth hydroxide	Complex mixture - mostly Ca(OH)_2
Molecular Weight	Trade Name and Synonyms	Material Use
$\text{Ca(OH)}_2 = 74.096$	High Calcium Hydrated Lime, Lime, Slaked lime, Lime Putty, Lime Slurry, Milk of Lime, Calcium Hydroxide	Neutralization, Flocculation, Stabilization, absorption

SECTION II - COMPOSITION AND INFORMATION ON INGREDIENTS

Hazardous Ingredients	Approximate Concentration (% by weight)	C.A.S. Number	Exposure limits (mg/m^3)					
			OSHA PEL (TWA) 8/40h	ACGIH TLV (TWA) 8/40h	RSST VEMP (TWA) 8/40h	MSHA PEL (Note 2) (TWA) 8/40h	NIOSH REL (TWA) 10/40h	NIOSH IDLH
(Complex Mixture)	(% by weight)		(TWA) 8/40h	(TWA) 8/40h	(TWA) 8/40h	(TWA) 8/40h	(TWA) 10/40h	
Calcium hydroxide	92 to 100	1305-62-0	5	5	5	5	N/A	N/A
Crystalline Silica, Quartz	0.1 to 1	14808-60-7	10/[(%SiO ₂)+2] (respirable silica dust)	0.1 (respirable silica dust)	0.1 (respirable silica dust)	10/[(%SiO ₂)+2] (respirable silica dust)	0.05 (respirable free silica)	50
Crystalline Silica, Quartz	0 to 0.1 (Note 1)	14808-60-7	10/[(%SiO ₂)+2] (respirable silica dust)	0.1 (respirable silica dust)	0.1 (respirable silica dust)	10/[(%SiO ₂)+2] (respirable silica dust)	0.05 (respirable free silica)	50

(note 1) : Concentration of crystalline silica in a series of lime products will vary from source to source. It was not detected on some samples (< 0.1% w/w). Therefore two ranges are being disclosed. (Note 2) : ACGIH TLV Version 1973 has been adopted by the line Safety Health Administration (MSHA) as the regulatory Exposure Standard.

Material Name / Identifier : HYDRATED LIME

Page 2 of 8

SECTION III - PHYSICAL AND CHEMICAL DATA

Physical State Gas <input type="checkbox"/> Liquid <input type="checkbox"/> Solid <input checked="" type="checkbox"/>	Odor and Appearance Slight earthy odor - Fine white powder		Odor Threshold (p.p.m.) Not applicable	Specific Gravity 2.3 - 2.4
Vapor Pressure (mm) Not applicable	Vapor Density (Air = 1) Not applicable	Evaporation Rate Not applicable	Boiling Point (°C) Not applicable	Melting Point (°C) Not applicable
Solubility in Water (20°C) 0.165g/100g Sat.soln	Volatiles (% by volume) Not applicable	pH (25 °C) Sat. soln Ca(OH) ₂ 12.45	Bulk Density (kg/m ³) 320 - 680	Coefficient of water/oil distribution Not applicable

SECTION IV - FIRE OR EXPLOSION HAZARD DATA

Flammability If yes, under Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> which conditions:			
Extinguishing Media <p style="text-align: center;">Calcium Hydroxide does not burn. Use extinguishing media appropriate to surrounding fire conditions.</p>			
Special Fire Fighting Procedures <p style="text-align: center;">Not applicable</p>			
Flash point (°C) and Method Not applicable	Upper flammable limit (% by volume) Not applicable	Lower flammable limit (% by volume) Not applicable	
Auto Ignition Temperature (°C) Not applicable	TDG Flammability Classification Non-flammable	Hazardous Combustion Products None	
Dangerous Combustion Products None			
EXPLOSION DATA			
Sensitivity to Chemical Impact Not applicable	Rate of Burning Not applicable	Explosive Power Not applicable	Sensitivity to Static Discharge Not applicable

Material Name / Identifier : HYDRATED LIME

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SECTION V - REACTIVITY DATA**Chemical Stability**Yes ☐ No ☒

If no, under which conditions?

Absorbs carbon dioxide in the air to form calcium carbonate.

Incompatibility to other substancesYes ☒ No ☐

If so, which ones?

Boron tri-fluoride, chlorine tri-fluoride, ethanol, fluorine, hydrogen fluoride, phosphorus pentoxide; and acids (violent reaction with generating heat and possible explosion in confined area).

ReactivityYes ☒ No ☐

If so, under which conditions?

Reacts violently with strong acids. Reacts chemically with acids and many other compounds and chemical elements to form calcium based compounds. Explosive when mixed with nitro organic compounds.

Hazardous Decomposition Products

Thermal decomposition at 540°C will produce calcium oxide and water.

Hazardous Polymerization Products

Will not occur.

SECTION VI - TOXICOLOGICAL PROPERTIES**Route of Entry**☒ Skin Contact☐ Skin Absorption☒ Eye Contact☐ Acute Inhalation☐ Chronic Inhalation☐ Ingestion**Effects of Acute Exposure to Product**

Skin

Mucous and skin corrosion, removes natural skin oils.

Eyes

Severe eye irritation, intense watering of the eyes, possible lesions, possible blindness when exposed for prolonged period. Eye-Rabbit-10mg/ 24 h - Severe.

Inhalation

If inhaled in form of dust, irritation of breathing passages, cough, sneezing.

Ingestion

If ingested: pain, vomiting blood, diarrhea, collapse, drop in blood pressure (indicates perforation of esophagus or stomach).

Effects of Chronic Exposure to Product

Contact dermatitis

LD₅₀ of Product (Specify Species and Route)
(Food grade Ca(OH)₂: 7340mg/kg)
(Rats, ingestion)Irritancy of Product
Severe to moist tissuesExposure limits of Product
UnavailableLC₅₀ of Product (Specify Species)
UnavailableSensitization to Product
NoneSynergistic materials
None reported☒ Carcinogenicity☐ Reproductive effects☐ Teratogenicity☐ Mutagenicity

Calcium Hydroxide is not listed on the MSHA, OSHA or IARC lists of carcinogens. However, hydrated lime could contain crystalline silica, which inhaled in the form of quartz or cristobalite from occupational sources, is classified by IARC as (Group 1) carcinogenic to humans.

Material Name / Identifier : HYDRATED LIME

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SECTION VII - PREVENTIVE MEASURES

Personal Protective Equipment (PPE) Wear clean, dry gloves, full length pants over boots, long sleeved shirt buttoned at the neck, head protection and approved eye protection selected for the working conditions.

Gloves (Specify)	Respiratory (Specify)	Eyes (Specify)	Footwear (Specify)
Gauntlets Cuff style	NIOSH approved filtering anti-dust mask	Tight fitting goggles with side shields. Do not wear contact lenses when handling this chemical.	Resistant to caustics

Clothing (Specify)	Other (Specify)
Fully covering skin	Evaluate degree of exposure and use PPE if necessary. After handling lime, employees must shower. If exposed daily, use oil, Vaseline, silicone base creams etc. to protect exposed skin, particularly neck, face and wrists.

Engineering Controls (e.g. ventilation, enclosed process, specify)

Enclose dust sources; use exhaust ventilation (dust collector) at handling points, keep levels below Max. Concentration Permitted.

Leak and Spill Procedure

Limit access to trained personnel. Use industrial vacuums for large spills. Ventilate area.

Waste Disposal

Transport to disposal area or bury. Review Federal, Provincial and local Environmental regulations.

Handling Procedures and Equipment

Avoid skin and eye contact. Minimize dust generation. Wear protective goggles and in cases of insufficient ventilation, use anti-dust mask. An eye wash station and safety shower should be readily available where this material or its water dispersions are used. Contact lenses should not be worn when working with this chemical.

Storage Requirements

Keep tightly closed containers in a cool, dry and well-ventilated area, away from acids. Keep out of reach of children.

Special Shipment Information

Calcium Hydroxide is neither regulated by the Transportation of Dangerous Goods (TDG) Regulations (Canada) nor the Hazardous Materials Regulations (USA).

Material Name / Identifier : HYDRATED LIME

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SECTION VIII - FIRST AID MEASURES**Skin**

Carefully and gently brush the contaminated body surfaces in order to remove all traces of lime. Use a brush, cloth or gloves. Remove all lime-contaminated clothing. Rinse contaminated area with lukewarm water for 15 to 20 minutes. Consult a physician if exposed area is large or if irritation persists.

Eyes

Immediately rinse contaminated eye(s) with gently running lukewarm water (saline solution is preferred) for 15 to 20 minutes. In the case of an embedded particle in the eye, or chemical burn, as assessed by first aid trained personnel, contact a physician.

Inhalation

Move source of dust or move victim to fresh air. Obtain medical attention immediately. If victim does not breathe, give artificial respiration.

Ingestion

If victim is conscious, give 300 ml (10 oz) of water, followed by diluted vinegar (1 part vinegar, 2 parts water) or fruit juice to neutralize the alkali. Do not induce vomiting. Contact a physician immediately.

General Advice

Consult a physician for all exposures except minor instances of inhalation.

SECTION IX - REGULATORY INFORMATION

Superfund Amendments and Reauthorization Act of 1986 (SARA Title III) / The Emergency Planning and "Community Right-to-Know" Act (EPCRA) / Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

Component Calcium Hydroxide has been reviewed against the following regulatory listings:

- Section 302 - Emergency Planning Notification. Extremely Hazardous Substances (EHS) List and Threshold Planning Quantity (TPQ). (40 CFR, Part 355, Section 30) : Not listed.
- Section 304 - Emergency Release Notification. Extremely Hazardous Substances (EHS) and Reportable Quantity (RQ) List. (40 CFR, Part 355, Section 40) : Not listed.
- Section 311/312 - Hazard Categories (40 CFR, Part 370) : This product is regulated under CFR 1910.1200 (OSHA Hazard Communication) as Immediate (Acute) Health Hazards - Corrosive.
- Section 313 - Toxics Release Inventory (TRI). Toxic Chemical List (40 CFR, Part 372). Not listed.

CWA 311. - Clean Water Act List of Hazardous Substances.

Calcium Hydroxide has been withdrawn from the Clean Water Act (CWA) list of hazardous substances. (11/13/79) (44FR85400)

California Proposition 65.

Component Calcium Hydroxide does not appear on the above regulatory listing. This product may contain small amounts of crystalline silica. Silica, crystalline (Airborne particles of respirable size) is regulated under California's Safe Drinking Water and Toxic Enforcement Act of 1988. (Proposition 65)

Transportation - Hazardous Materials Regulations (USA) & Transportation of Dangerous Goods (TDG) Regulations (Can).

Calcium Hydroxide does not appear on the above regulatory listings

Toxic Substances Control Act (TSCA).

All naturally occurring components of this product are automatically included in the USEPA TSCA Inventory List per 40 CFR 710.4 (b). All other components are on the USEPA TSCA Inventory List. Calcium Hydroxide is exempt from reporting under the inventory update rule.

Canadian Environmental Protection Act (CEPA) - Substances Lists (DSL/NDSL).

Calcium Hydroxide appears on the Domestic Substances List (DSL).

Material Name / Identifier : HYDRATED LIME

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SECTION IX - REGULATORY INFORMATION (Cont'd)

ANSI/NSF 60 - Drinking Water Treatment Additives.

Hydrated Lime has been investigated with respect to elements identified by EPA as toxic and it has been classified for use in direct contact with drinking water. (in accordance with Standard ANSI/NSF 60). For a list of classified products, refer to Underwriters Laboratories Inc.'s Online Certifications Directory.

FDA - U.S. Food and Drug Administration, Department of Health and Human Services.

Calcium Hydroxide has been determined as "Generally Recognized As Safe" (GRAS) by FDA. See 21CFR184.1205. (CFR Title 21 Part 184 -- Direct food substances affirmed as generally recognized as safe).

SECTION X - OTHER INFORMATIONHazardous Materials
Identification System
(U.S.)National Fire Protection
Association (U.S.)

Health Hazard

Fire Hazard

Instability / Thermal
Hazard

Specific hazard

WHMIS Classification: "E" Corrosive Materials.

WHMIS Classification: "D2A" Materials causing other
toxic effects.

Symbol:



Symbol:



Additional Information/Comments:

The technical data contained herein is given as information only and is believed to be reliable.
GRAYMONT makes no guarantee of results and assumes no obligation or liability in connection therewith.

Sources Used:

NFPA, NLA, TDG, CSST, RSST, (LSRD-FASEB), Hazardous Products Act, Environment Canada, Enviroguide, OSHA, ACGIH, IARC, NIOSH, CFR, NTP, HSDB, EPA SRS, Chemistry and Technology of Lime and Limestone (John Wiley and Sons, Inc.), Lime and Limestone (WILEY-VCH).

SECTION XI - PREPARATION INFORMATION

Prepared by:

GRAYMONT (QC) INC.
Technical Services

Telephone number:

(450) 449-2262

Date :

July 2004

MATERIAL SAFETY DATA SHEET

PRODUCT: AMLOX-110

ISSUED: 01/31/05

REPLACES: 01/31/03

Section 1: CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

PRODUCT NAME: AMLOX-110

DESCRIPTION: Flux for treating molten aluminum and its alloys.

MANUFACTURER: AMERICAN METAL CHEMICAL CORPORATION

ADDRESS: 835 West Smith Rd 3546 South Morgan Street
Medina, Ohio 44256 Chicago, Illinois 60609

TELEPHONE: (330) 725-4501 (24 Hours) (773) 254-1318

FACSIMILE: (330) 723-0487 (773) 254-4722

Section 2: COMPOSITION INFORMATION ON INGREDIENTS

PERCENT	CAS#	%
Sodium Chloride	7647-14-5	40-48
Potassium Chloride	7447-40-7	26-35
Sodium Silicofluoride	16893-85-9	9-12
Sodium Sulfate	7757-82-6	3-5
Sodium Carbonate	497-19-8	3-5
Petro AG	NONE	0.00025

Section 3: HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW

Contains sodium silicofluoride.

Odorless, white/pinkish mixture of inorganic chemicals with a granular appearance.

Irritating to eyes, skin and mucous membranes.

Ingestion may cause vomiting, abdominal cramps and diarrhea.

POTENTIAL HEALTH EFFECTS

EYE CONTACT: Irritating to eyes.

SKIN CONTACT: May cause irritation.

INGESTION: May cause vomiting, abdominal cramps and diarrhea.

INHALATION: May cause respiratory tract irritation.

TARGET ORGANS: Lungs, kidneys, bones, skin and eyes.

MATERIAL SAFETY DATA SHEET

PRODUCT: AMLOX-110

ISSUED: 01/31/05

REPLACES: 01/31/03

POTENTIAL HEALTH EFFECTS (continued)

ACUTE: Irritating to eyes, skin, mucous membranes and respiratory tract. Ingestion may cause nausea vomiting, abdominal cramps and diarrhea.

CHRONIC: Prolonged inhalation may cause nosebleeds, sinus problems, sclerosis of the bones and calcification of the ligaments.

CARCINOGENICITY: The ingredients in this product are not considered to be carcinogenic by NTP, IARC or OSHA

Section 4: FIRST AID MEASURES

EYE CONTACT: Immediately flush with water and continue washing for at least 15 minutes. Get medical attention immediately.

SKIN CONTACT: Wash with soap and water.

INGESTION: Drink water. Get medical attention immediately.

INHALATION: Remove person from source of exposure to fresh air. If shortness of breath, coughing or chest pain develop, get medical attention immediately.

Section 5: FIRE FIGHTING MEASURES

FLAMMABLE PROPERTIES		FLAMMABLE LIMITS	
Flashpoint:	N.A.	Lower Limit:	N.A.
Method:	N.A.	Upper Limit:	N.A.

EXTINGUISHING MEDIA: Non-combustible. Use extinguishing media suitable for surrounding fire.

FIRE FIGHTING INSTRUCTIONS: Wear full protective equipment (Bunker Gear) and a self contained breathing apparatus (SCBA).

FIRE & EXPLOSION HAZARDS: None

Section 6: ACCIDENTAL RELEASE MEASURES

SPILL PROCEDURES: Sweep into disposable container.

Section 7: HANDLING AND STORAGE

HANDLING: Avoid breathing dust and fumes during use. Use with adequate ventilation; if TLV's are exceeded, wear NIOSH approved respirator. Wear protective clothing, impermeable gloves and safety glasses with side shields.

STORAGE: In original container or plastic lined container with tightly closed lid. Store away from acids in cool dry area. MATERIAL MUST BE KEPT DRY AS MOISTURE MAY CAUSE METAL RUPTURE DURING USE.

DISPOSAL: Check with local authorities for disposal instructions.

MATERIAL SAFETY DATA SHEET

PRODUCT: AMLOX-110
ISSUED: 01/31/05
REPLACES: 01/31/03

Section 8: EXPOSURE CONTROL PERSONAL PROTECTION**EXPOSURE GUIDELINES**

INGREDIENT	OSHA (PEL)		ACGIH (TLV)	
	TWA	STEL	TWA	STEL
Sodium Silicofluoride	2.5mg/m ³ (F)	N.D.	2.5mg/m ³ (F)	N.D.

ENGINEERING CONTROLS:

Adequate ventilation

PERSONAL PROTECTION EQUIPMENT: Wear protective clothing, impermeable gloves and safety glasses with side shields. If TLV's are exceeded wear NIOSH approved respirator.

Section 9: PHYSICAL AND CHEMICAL PROPERTIES**PHYSICAL STATE:**

Solid

APPEARANCE:

White/pinkish mixture of inorganic chemicals with a granular appearance.

ODOR:

Odorless

SOLUBILITY IN WATER:

Partially soluble

Section 10: STABILITY AND REACTIVITY**CHEMICAL STABILITY:**

Stable

INCOMPATIBILITY:

Acids

HAZARDOUS POLYMERIZATION:

Will not occur.

HAZARDOUS DECOMPOSITION PRODUCTS:May form hydrogen chloride, hydrogen fluoride and nitrogen oxides (NO_x) during use, in the presence of moisture.

DISCLAIMER: Information presented herein has been compiled from sources considered to be reliable and is accurate to the best of our knowledge and belief, but is not guaranteed to be so. It is the user's responsibility to determine the suitability of any material for a specific use and to adopt such safety precautions as may be necessary. If further information is needed to use this material safely, please contact American Metal Chemical Corporation.

N.E. NONE ESTABLISHED
N.A. NOT APPLICABLE
N.D. NOT DETERMINED
T.D. TOTAL DUST
R. RESPIRABLE

MATERIAL SAFETY DATA SHEET

LAFRANCE MANUFACTURING COMPANY
PO Box 1008
124 MILLWELL DRIVE
MARYLAND HEIGHTS, MISSOURI 63043

TELEPHONE NUMBER.....314.298.2662
FAX NUMBER.....314.298.3420
CHEMTREC EMERGENCY NUMBER.....800.424.9300
REVISION DATE: 01-05-2007

SECTION I PRODUCT IDENTIFICATION

FRANKOTE PMC 100/N CERAMIC COATING

HMIS RATING (USA)

	* 2
	0
	0
PERSONAL PROTECTION	E

WHMIS RATING (CANADA)

CLASS D-2B: Material causing other toxic effects.

CEPA DSL: Listed on inventory

This product has been classified in accordance with the hazard criteria of the CPR and the MSDS contains all the information required by the CPR.

SECTION II INGREDIENTS

INGREDIENT	%	CAS #	ACGIH TLV MG/M ³	OSHA PEL MG/M ³
CERAMIC MATERIAL	30 - 40	14940-68-2, 66402-68-4	10 (DUST)	15 (DUST)
SODIUM SILICATE	1 - 10	1344-09-8		
WATER	50 - 60			
			RESPIRABLE 5 MG/M ³	5 MG/M ³

THIS PRODUCT CONTAINS LESS THAN 1% CRYSTALLINE SILICA.

ALL COMPONENTS ARE INCLUDED IN THE EPA TOXIC SUBSTANCE CONTROL ACT (TSCA) CHEMICAL SUBSTANCE INVENTORY

THE INGREDIENTS CONTAINED IN THIS PRODUCT AND THE FINAL PRODUCT ITSELF WERE MANUFACTURED WITHOUT THE USE OF OZONE DEPLETING CHEMICALS

SECTION III PHYSICAL DATA

BOILING POINT	212°F
PH	10.5 - 11.5
SPECIFIC GRAVITY (H ₂ O = 1)	1.20 - 1.25
VAPOR PRESSURE	APPROX. = WATER
VAPOR DENSITY (AIR = 1)	APPROX. = WATER
SOLUBILITY IN WATER BY WEIGHT	DISPERSIBLE
% VOLATILES BY WEIGHT	<70
EVAPORATION RATE (BUAC = 1)	<1
APPEARANCE	WHITE DISPERSION
ODOR	MILD

SECTION IV FIRE AND EXPLOSION DATA

FLASH POINT (TEST METHOD)	NONE-CONTAINS WATER
AUTOIGNITION TEMPERATURE	N/A
FLAMMABLE LIMITS AIR % BY VOLUME	LOWER: N/A UPPER: N/A
EXTINGUISHING MEDIA	N/A
SPECIAL FIRE FIGHTING PROCEDURES	N/A
UNUSUAL FIRE AND EXPLOSION HAZARD	NONE

SECTION V REACTIVITY DATA

STABILITY	STABLE
CONDITIONS TO AVOID	NONE
INCOMPATIBILITY	ACIDS
HAZARDOUS DECOMPOSITION	NONE
HAZARDOUS POLYMERIZATION	WILL NOT OCCUR

MATERIAL SAFETY DATA SHEET
FRANKOTE PMC 100/N CERAMIC COATING

SECTION VI HEALTH HAZARD INFORMATION

THIS MATERIAL CONTAINS VERY LOW LEVELS OF NATURALLY OCCURRING RADIOACTIVE MATERIAL (NORM). OBSERVANCE OF THE OSHA LIMIT FOR RESPIRABLE DUSTS OF 5 MG/M³ WILL ENSURE THE USE OF THIS PRODUCT TO BE WELL BELOW THE REGULATORY LIMITS ESTABLISHED.

ROUTES OF EXPOSURE: INHALATION, DERMAL, EYE, INGESTION

EFFECTS OF OVEREXPOSURE

ACUTE: EYE IRRITATION DUE TO PH. SKIN IRRITATION: ABRADED OR CUT SKIN MAY INCREASE IRRITATION. DUST FROM DRIED PRODUCT MAY INCREASE PRESENT RESPIRATORY PROBLEMS. (EXAMPLE: BRONCHITIS, ASTHMA).

CHRONIC TOXICITY: CONTAINS CRYSTALLINE SILICA WHICH CAUSES SILICOSIS. EXCESSIVE INHALATION OF DUST MAY CAUSE PNEUMONITIS, CYANOSIS AND PULMONARY EDEMA. LONG-TERM INHALATION CAUSES LUNG DAMAGE. RESPIRABLE CRYSTALLINE SILICA HAS BEEN CLASSIFIED AS A GROUP 1 CARCINOGENIC BY IRAC AND IS LISTED BY NTP AS A SUBSTANCE WHICH MAY REASONABLY BE ANTICIPATED TO BE A CARCINOGEN.

EMERGENCY AND FIRST AID PROCEDURES

EYES: FLUSH WITH LARGE AMOUNTS OF WATER FOR 15 MINUTES; REFER TO MEDICAL PERSONNEL.

SKIN: WASH WITH SOAP AND WATER; WASH CONTAMINATED CLOTHING BEFORE REUSE.

INHALATION: REMOVE TO FRESH AIR; CALL PHYSICIAN

INGESTION: GIVE TWO GLASSES OF WATER AND DO NOT INDUCE VOMITING; CALL PHYSICIAN

NOTES TO PHYSICIAN : NONE

SECTION VII SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IF MATERIAL IS RELEASED OR SPILLED: SMALL SPILLS SHOULD BE ABSORBED WITH ABSORBENT MATERIAL. LARGE SPILLS SHOULD HAVE AREA DIKED TO PREVENT SPREADING; PUMP LIQUID INTO A SALVAGE TANK AND ABSORB REMAINING MATERIAL; SHOVEL INTO CONTAINER.

NEUTRALIZING CHEMICALS: NONE

WASTE DISPOSAL METHOD: DISPOSE OF IN ACCORDANCE WITH ALL APPLICABLE FEDERAL, STATE AND LOCAL REGULATIONS.

SECTION VIII SPECIAL PROTECTION INFORMATION

VENTILATION REQUIREMENTS: ADEQUATE TO KEEP AIRBORNE DUST BELOW TLV CONCENTRATION.

SPECIFIC PERSONAL PROTECTIVE EQUIPMENT

RESPIRATORS	NIOSH APPROVED RESPIRATOR IF TLV IS EXCEEDED
EYES	SAFETY GOGGLES
GLOVES	CHEMICAL RESISTANT
OTHER CLOTHING AND EQUIPMENT	AS REQUIRED TO MINIMIZE SKIN CONTACT

SECTION IX TRANSPORTATION DATA

DOT SHIPPING NAME: NOT REGULATED
DOT HAZARD CLASS: NOT REGULATED

HAZARDOUS INGREDIENT(S): NONE
UN NUMBER: NONE

SECTION X SPECIAL PRECAUTION

STORAGE: STORE UNDER CONTROLLED TEMPERATURES - RANGE 32°F TO 100°F

HANDLING: KEEP FROM FREEZING. MINIMIZE SKIN CONTACT. WASH WITH SOAP AND WATER BEFORE EATING, DRINKING, SMOKING OR USING TOILET FACILITIES. LAUNDER CONTAMINATED CLOTHING BEFORE REUSE. PROPERLY DISPOSE OF CONTAMINATED LEATHER ARTICLES, INCLUDING SHOES, THAT CAN NOT BE DECONTAMINATED. DO NOT TRANSFER TO UNMARKED CONTAINERS. KEEP CONTAINER CLOSED WHEN NOT IN USE TO REDUCE EVAPORATION. DO NOT TRANSFER TO NONFERROUS CONTAINERS SUCH AS ALUMINUM OR GALVANIZED DRUMS WHICH MAY REACT TO NONFERROUS CONTAINERS PRODUCE FLAMMABLE GAS. NEVER USE PRESSURE TO EMPTY CONTAINER, AS THIS MAY RUPTURE CONTAINER.

COMPLIES WITH OSHA HAZARD COMMUNICATION STANDARD (29 CFR 1910.1200)

THE INFORMATION CONTAINED IN THIS MSDS IS TO THE BEST OF OUR KNOWLEDGE TRUE AND ACCURATE. HOWEVER, NO WARRANTY IS EXPRESSED OR IMPLIED REGARDING THE ACCURACY OF THE DATA, THE RESULTS TO BE OBTAINED FROM THE USE THEREOF, OR THAT SUCH USE WILL NOT INFRINGE ANY PATENT.

*Alum. Finished Product***Material Safety Data Sheet**

Material Name: DEOX-ALUMINUM CONES

ID: MARC-001

***** Section 1 - Chemical Product and Company Identification *****

Manufacturer's Part Number: Grades 1, 3 (4 oz.)

Chemical Name: Aluminum alloy

Product Use: Deoxidizer, grain refiner, alloying element

Manufacturer Information

Metalico Aluminum Recovery, Inc.

1951 Hamburg Turnpike

Box 6

Lackawanna, NY 14218

Phone: (716) 828-0312

Fax: (716) 828-1763

***** Section 2 - Composition / Information on Ingredients *****

CAS #	Component	Percent
7429-90-5	Aluminum	>90
7440-68-6	Zinc	<5
7439-95-4	Magnesium	<2
7440-50-8	Copper	<2
7439-98-5	Manganese	<1
7439-89-8	Iron	<1
7440-21-3	Silicon	<1
7440-31-5	Tin	<0.1
7439-92-1	Lead	<0.1
7440-02-0	Nickel	<0.1
7440-47-3	Chromium	<0.1
7440-32-6	Titanium	<0.1

Component Information/Information on Non-Hazardous Components

This product is considered to be an article according to 29 CFR 1910.1200 (OSHA Hazard Communication Standard). While no specific safety information is required for articles, this Material Safety Data Sheet is provided for informational purposes.

This material is not a controlled product according to the Canadian WHMIS regulations.

***** Section 3 - Hazards Identification *******Emergency Overview**

Excessive inhalation of metal fume (or dust) can cause an acute reaction known as metal fume fever, with flu-like symptoms. Contact with molten material will cause severe burns. Contact with acids or alkalis may generate flammable hydrogen gas. Use dry chemical or sand extinguishing media only. DO NOT use water or foam. Firefighters should wear full protective clothing and self contained breathing apparatus.

Potential Health Effects: Eyes

Fumes from heated material (or dust) may cause eye irritation. Contact with molten metal will cause severe burns.

Potential Health Effects: Skin

Fumes from heated material (or dust) may cause skin irritation. Contact with molten metal will cause severe burns.

Potential Health Effects: Ingestion

Ingestion is unlikely under normal conditions of use.

Potential Health Effects: Inhalation

Fumes from heated material may cause respiratory tract irritation. Excessive inhalation of metal fume or dust can cause an acute reaction known as metal fume fever. Symptoms include chills and fever, a metallic taste in the mouth, and throat irritation. Symptoms may last 24 to 48 hours after exposure.

Medical Conditions Aggravated by Exposure

Persons with pre-existing eye, skin, or respiratory conditions may be more susceptible to the irritating effects of metal fume or dust.

Material Safety Data Sheet**Material Name: DEOX-ALUMINUM CONES****ID: MARC-001****HMIS Ratings: Health: 1 Fire: 0 Physical Hazard: 0****Hazard Scale: 0 = Minimal 1 = Slight 2 = Moderate 3 = Serious 4 = Severe * = Chronic hazard******* Section 4 - First Aid Measures *******First Aid: Eyes**

If exposed to fume or dust, flush eyes immediately with water for at least 15 minutes. If irritation develops or persists, seek medical attention. For contact with molten material, seek immediate medical attention for burns.

First Aid: Skin

For fume or dust: remove contaminated clothing, wash affected area with soap and water, and seek medical attention if irritation develops or persists. For contact with molten metal, DO NOT attempt to remove solidified metal on skin or clothing. Cover burns and seek immediate medical attention.

First Aid: Ingestion

Ingestion is unlikely under normal conditions of use. If ingestion occurs, do not induce vomiting, and seek medical advice, referring attending personnel to this MSDS.

First Aid: Inhalation

Remove source of contamination or move affected person to fresh air. Seek medical attention if irritation persists or if symptoms of metal fume fever develop.

***** Section 5 - Fire Fighting Measures *******Flash Point: NA****Upper Flammable Limit (UFL): NA****Auto Ignition: approx. 680 °C (est'd, metal dust in air)****Rate of Burning: NA****General Fire Hazards**

As supplied, aluminum alloy is not flammable, but dust or fume may form flammable or explosive air mixtures. Contact with acids or alkali hydroxides will produce hydrogen gas, that if concentrated, poses a fire/explosion hazard.

Hazardous Combustion Products

Aluminum oxide and various metal oxides.

Extinguishing Media

Dry chemical or sand. DO NOT use water or foam.

Fire Fighting Equipment/Instructions

Firefighters should wear full protective clothing including self contained breathing apparatus.

NFPA Ratings: Health: 1 Fire: 0 Reactivity: 0**Hazard Scale: 0 = Minimal 1 = Slight 2 = Moderate 3 = Serious 4 = Severe******* Section 6 - Accidental Release Measures *******Containment Procedures**

Solid metal is recyclable. Use vacuum cleaner for metal dust. Molten metal should be allowed to cool and solidify prior to cleanup/recycling.

Clean-Up Procedures

If dust or fumes are present, wear gloves and chemical goggles, and for excessive levels, respiratory protection. For molten metal, wear heat-resistant gloves and suitable protective clothing as well as goggles/respiratory protection.

Evacuation Procedures

Keep unnecessary personnel away.

Special Procedures

Contact local regulatory authorities for advice regarding disposal of cleanup materials.

***** Section 7 - Handling and Storage *******Handling Procedures**

Follow established job procedures when handling product. Consult your supervisor.

Material Safety Data Sheet**Material Name: DEOX-ALUMINUM CONES****ID: MARC-001****Storage Procedures**

Store metal in a DRY area, apart from incompatible materials. Ingots exposed to moisture should be thoroughly dry before adding to molten steel.

***** Section 8 - Exposure Controls / Personal Protection *******Exposure Guidelines****A: General Product Information**

Follow all applicable exposure limits.

B: Component Exposure Limits**Aluminum (7429-90-5)**

ACGIH: 10 mg/m3 TWA (metal dust)
OSHA: 15 mg/m3 TWA (total dust); 5 mg/m3 TWA (respirable fraction)
NIOSH: 10 mg/m3 TWA (total dust); 5 mg/m3 TWA (respirable dust)

Copper (7440-50-8)

ACGIH: 0.2 mg/m3 TWA (fume); 1 mg/m3 TWA (dusts and mists, as Cu)
OSHA: 0.1 mg/m3 TWA (fume, dusts, mists as Cu)
NIOSH: 1 mg/m3 TWA (dusts and mists)

Silicon (7440-21-3)

ACGIH: 10 mg/m3 TWA
OSHA: 10 mg/m3 TWA (total dust); 5 mg/m3 TWA (respirable fraction)
NIOSH: 10 mg/m3 TWA (total dust); 5 mg/m3 TWA (respirable dust)

Manganese (7439-96-5)

ACGIH: 0.2 mg/m3 TWA
OSHA: 1 mg/m3 TWA (fume)
5 mg/m3 Ceiling
NIOSH: 1 mg/m3 TWA (fume)
3 mg/m3 STEL

Tin (7440-31-5)

ACGIH: 2 mg/m3 TWA
OSHA: 2 mg/m3 TWA
NIOSH: 2 mg/m3 TWA

Chromium (7440-47-3)

ACGIH: 0.5 mg/m3 TWA
OSHA: 1 mg/m3 TWA
NIOSH: 0.5 mg/m3 TWA

Nickel (7440-02-0)

ACGIH: 1.5 mg/m3 TWA (inhalable fraction)
OSHA: 1 mg/m3 TWA
NIOSH: 0.015 mg/m3 TWA

Lead (7439-92-1)

ACGIH: 0.05 mg/m3 TWA
OSHA: 50 µg/m3 PEL (as Pb); 30 µg/m3 Action Level (as Pb. Poison - see 29 CFR 1910.1025)
NIOSH: 0.050 mg/m3 TWA

Engineering Controls

If dust or fumes are generated, use adequate local or general ventilation to ensure ambient concentrations do not exceed exposure limits.

Material Safety Data Sheet**Material Name: DEOX-ALUMINUM CONES****ID: MARG-001****PERSONAL PROTECTIVE EQUIPMENT****Personal Protective Equipment: Eyes/Face**

Safety glasses with side shields recommended for handling bulk product. Chemical goggles should be worn when fumes or dust are generated. For hot/molten material, heat-resistant full face shield should be used.

Personal Protective Equipment: Skin

Gloves and coveralls, shop coat, or other long-sleeved work clothing recommended for handling bulk product. For hot or molten metal, wear heat-resistant gloves and protective clothing.

Personal Protective Equipment: Respiratory

If fumes or dust are generated and cannot be controlled by ventilation systems, use NIOSH/MSHA approved respiratory protection, such as 42 CFR 84 Class N, R, or P-95 particulate filter cartridges.

Personal Protective Equipment: General

Use good industrial hygiene practices when using this product. Eyewash fountain and safety shower should be available in the work area.

***** Section 9 - Physical & Chemical Properties *****

Appearance:	Article (lustrous metal cone)	Odor:	None
Physical State:	Solid	pH:	NA
Vapor Pressure:	NA	Vapor Density:	NA
Boiling Point:	NA	Melting Point:	NA
Solubility (H₂O):	NA	Specific Gravity:	2.5 - 2.9 (as Aluminum)

***** Section 10 - Chemical Stability & Reactivity Information *******Chemical Stability**

Bulk form is chemically stable.

Chemical Stability: Conditions to Avoid

Prevent contact with incompatible materials. Aluminum dust can explode when exposed to heat, flame, or incompatible materials.

Incompatibility

Strong acids, bases, oxidizing agents.

Hazardous Decomposition

Aluminum oxides, various alloy metal oxides.

Hazardous Polymerization

Will not occur.

***** Section 11 - Toxicological Information *******Acute and Chronic Toxicity****A: General Product Information**

Principal route of exposure is inhalation of metal or metal oxide fumes generated during processing. If excessive fume is inhaled, 'metal fume fever' can occur within 3 to 10 hours of exposure. Symptoms include dryness and irritation of the upper respiratory tract, metallic taste, and flu-like symptoms of fever, nausea and vomiting, and muscle aches. Recovery occurs without medical intervention, usually within 24 to 48 hours of onset.

B: Component Analysis - LD50/LC50**Silicon (7440-21-3)**

Oral LD50 Rat: 3160 mg/kg

Iron (7439-89-6)

Oral LD50 Rat: 30 g/kg

Manganese (7439-96-5)

Oral LD50 Rat: 9 g/kg

Carcinogenicity**A: General Product Information**

No information available for this product.

Material Safety Data Sheet**Material Name: DEOX-ALUMINUM CONES****ID: MARC-001****B: Component Carcinogenicity****Chromium (7440-47-3)**

ACGIH: A4 - Not Classifiable as a Human Carcinogen
 IARC: Monograph 49, 1990 (Group 3 (not classifiable))

Nickel (7440-02-0)

ACGIH: A5 - Not Suspected as a Human Carcinogen
 NIOSH: potential occupational carcinogen
 NTP: Reasonably Anticipated To Be A Carcinogen (Possible Select Carcinogen)
 IARC: Monograph 49, 1990 (Group 2B (possibly carcinogenic to humans))

Lead (7439-92-1)

ACGIH: A3 - Animal Carcinogen
 OSHA: 50 µg/m3 PEL (as Pb); 30 µg/m3 Action Level (as Pb. Poison - see 29 CFR 1910.1025)
 IARC: Supplement 7, 1987; Monograph 23, 1980 (Evaluated as a group) (Group 2B (possibly carcinogenic to humans))

Chronic Toxicity

No information available for this product. Chronic inhalation of metal fumes may cause fibrotic changes to lung tissue.

Epidemiology

No information available for this product.

Neurotoxicity

No information available for this product.

Mutagenicity

No information available for this product.

Teratogenicity

No information available for this product.

***** Section 12 - Ecological Information *******Ecotoxicity****A: General Product Information**

No information available for product.

Aluminum: metallic, oxide, or soluble ionic forms do not accumulate in terrestrial or aquatic food chains.

Zinc: metallic form has minimal bioavailability. Soluble ionic form accumulates in both aquatic plants and animals. Soluble zinc also accumulates in terrestrial plant and animal life, with plant uptake dependent of species and soil pH.

B: Component Analysis - Ecotoxicity - Aquatic Toxicity**Zinc (7440-66-6)**

Test & Species	Conditions
96 Hr LC50 fathead minnow	6.4 mg/L
96 Hr EC50 freshwater algae (Selenastrum capricornutum)	30 µg/L
72 Hr LC50 water flea	5 µg/L

Copper (7440-50-8)

Test & Species	Conditions
96 Hr LC50 fathead minnow	23 µg/L
96 Hr LC50 rainbow trout	13.8 µg/L
96 Hr LC50 bluegill	236 µg/L
72 Hr EC50 freshwater algae (Scenedesmus subspicatus)	120 µg/L
96 Hr LC50 water flea	10 µg/L
96 Hr LC50 water flea	200 µg/L

Material Safety Data Sheet**Material Name: DEOX-ALUMINUM CONES****ID: MARC-001****Nickel (7440-02-0)****Test & Species****Conditions**

96 Hr LC50 rainbow trout (adults)	31.7 mg/L
96 Hr LC50 fathead minnow	3.1 mg/L
72 Hr EC50 freshwater algae (4 species)	0.1 mg/L
96 Hr LC50 water flea	510 µg/L

Lead (7439-92-1)**Test & Species****Conditions**

96 Hr LC50 brook trout	4.1 mg/L
96 Hr LC50 fathead minnow	6.5 mg/L
48 Hr LC50 water flea	600 µg/L

Environmental Fate

Aluminum: the fate and transport of aluminum in the environment is determined by factors affecting solubility. Acidic conditions increase the mobility of ionic forms of aluminum and tends to increase uptake by plants.

Zinc: in the terrestrial environment, mobility of zinc is affected by factors such as soil cation exchange capacity, pH, and redox potential.

***** Section 13 - Disposal Considerations *******US EPA Waste Number & Descriptions****A: General Product Information**

Wastes must be tested using methods described in 40 CFR Part 261 to determine if it meets applicable definitions of hazardous wastes.

B: Component Waste Numbers**Chromium (7440-47-3)**

RCRA: 5.0 mg/L regulatory level

Lead (7439-92-1)

RCRA: 5.0 mg/L regulatory level

Disposal Instructions

Unused product should be recycled if possible. Consult Local, State, Provincial, or Federal Regulatory agencies for advice regarding recycling or environmentally sound disposal of this product.

***** Section 14 - Transportation Information *******US DOT Information**

Shipping Name: Not regulated in ingot form

***** Section 15 - Regulatory Information *******US Federal Regulations****A: General Product Information**

Components of this product have been checked against the non-confidential TSCA inventory by CAS Registry Number. Components not identified on this non-confidential inventory are either exempt from listing (i.e. polymers, hydrates) or are listed on the confidential inventory as declared by the supplier. All components listed in this product appear on the Canadian DSL/NDL.

B: Component Analysis

This material contains one or more of the following chemicals required to be identified under SARA Section 302 (40 CFR 355 Appendix A), SARA Section 313 (40 CFR 372.65) and/or CERCLA (40 CFR 302.4).

Aluminum (7429-90-5)

SARA 313: 1.0 percent de minimis concentration (fume or dust only)

Material Safety Data Sheet**Material Name: DEOX-ALUMINUM CONES****ID: MARC-001****Zinc (7440-66-6)**

SARA 313: 1.0 percent de minimis concentration (only fume or dust)

CERCLA: 1000 lb final RQ (no reporting of releases of this hazardous substance is required if the diameter of the pieces of the solid metal released is equal to or exceeds 0.004 inches); 454 kg final RQ (no reporting of releases of this hazardous substance is required if the diameter of the solid metal released is equal to or exceeds 0.004 inches)

Copper (7440-50-8)

SARA 313: 1.0 percent de minimis concentration

CERCLA: 5000 lb final RQ (no reporting of releases of this hazardous substance is required if the diameter of the pieces of the solid metal released is equal to or exceeds 0.004 inches); 2270 kg final RQ (no reporting of releases of this hazardous substance is required if the diameter of the pieces of the solid metal released is equal to or exceeds 0.004 inches)

Chromium (7440-47-3)

CERCLA: 5000 lb final RQ (no reporting of releases of this hazardous substance is required if the diameter of the pieces of the solid metal released is equal to or exceeds 0.004 inches); 2270 kg final RQ (no reporting of releases of this hazardous material is required if the diameter of the pieces of the solid metal released is equal to or exceeds 0.004 inches)

Nickel (7440-02-0)

CERCLA: 100 lb final RQ (no reporting of releases of this hazardous substance is required if the diameter of the pieces of the solid metal released is equal to or exceeds 0.004 inches); 45.4 kg final RQ (no reporting of releases of this hazardous substance is required if the diameter of the pieces of the solid metal released is equal to or exceeds 0.004 inches)

Lead (7439-92-1)

SARA 313: 100 lb Reporting Threshold (PBT Chemical)

CERCLA: 10 lb final RQ (no reporting of releases of this hazardous substance is required if the diameter of the pieces of the solid metal released is equal to or exceeds 0.004 inches); 4.54 kg final RQ (no reporting of releases of this hazardous substance is required if the diameter of the pieces of the solid metal released is equal to or exceeds 0.004 inches)

C: Component Marine Pollutants

This material contains one or more of the following chemicals required by US DOT to be identified as marine pollutants.

Component	CAS #	
Copper	7440-50-8	DOT regulated severe marine pollutant

State Regulations**A: General Product Information**

Other state regulations may apply. Check individual state requirements.

B: Component Analysis - State

The following components appear on one or more of the following state hazardous substances lists:

Component	CAS	CA	MA	MN	NJ	PA	RI
Aluminum	7429-90-5	Yes	Yes	Yes	Yes	Yes	Yes
Zinc	7440-66-6	Yes	Yes	No	Yes	Yes	Yes
Magnesium	7439-95-4	Yes	Yes	No	Yes	Yes	Yes
Copper	7440-50-8	Yes	Yes	Yes	Yes	Yes	Yes
Silicon	7440-21-3	No	Yes	Yes	Yes	Yes	Yes
Iron	7439-89-8	Yes	No	No	No	No	No
Manganese	7439-96-5	Yes	Yes	Yes	Yes	Yes	Yes
Tin	7440-31-5	Yes	Yes	Yes	Yes	Yes	Yes
Titanium	7440-32-8	Yes	No	No	Yes	No	No
Chromium	7440-47-3	Yes	Yes	Yes	Yes	Yes	Yes

Material Safety Data Sheet**Material Name: DEOX-ALUMINUM CONES****ID: MARC-001**

Nickel	7440-02-0	Yes	Yes	Yes	Yes	Yes	Yes
Lead	7439-92-1	Yes	Yes	Yes	Yes	Yes	Yes

The following statement(s) are provided under the California Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65):

WARNING! This product contains a chemical known to the state of California to cause cancer.
 WARNING! This product contains a chemical known to the state of California to cause reproductive/developmental effects.

Canadian WHMIS Information**A: General Product Information**

WHMIS Classification and Description
 DEOX-ALUMINUM CONES are classified as:
 Not classified

This product has been classified in accordance with the hazard criteria of the CPR and the MSDS contains all of the information required by the CPR

B: Component Analysis - WHMIS IDL

The following components are identified under the Canadian Hazardous Products Act Ingredient Disclosure List:

Component	CAS #	Minimum Concentration
Aluminum	7429-90-5	1 % (English Item 47, French Item 197)
Copper	7440-50-8	1 % (English Item 433, French Item 578)

Additional Regulatory Information**A: General Product Information**

No information available for the product.

B: Component Analysis - Inventory

Component	CAS #	TSCA	CAN	EEC
Aluminum	7429-90-5	Yes	DSL	EINECS
Zinc	7440-68-6	Yes	DSL	EINECS
Magnesium	7439-95-4	Yes	DSL	EINECS
Copper	7440-50-8	Yes	DSL	EINECS
Silicon	7440-21-3	Yes	DSL	EINECS
Iron	7439-89-6	Yes	DSL	EINECS
Manganese	7439-96-5	Yes	DSL	EINECS
Tin	7440-31-5	Yes	DSL	EINECS
Titanium	7440-32-6	Yes	DSL	EINECS
Chromium	7440-47-3	Yes	DSL	EINECS
Nickel	7440-02-0	Yes	DSL	EINECS
Lead	7439-92-1	Yes	DSL	EINECS

***** Section 16 - Other Information *******Other Information**

The information herein is presented in good faith and believed to be accurate as of the effective date given. However, no warranty, expressed or implied, is given. It is the buyer's responsibility to ensure that its activities comply with Federal, State or provincial, and local laws.

MSDS History

New Material Safety Data Sheet 25 November 2003.

Material Safety Data Sheet**Material Name: DEOX-ALUMINUM CONES****ID: MARC-001****Key/Legend**

ACGIH = American Conference of Governmental Industrial Hygienists; CAS = Chemical Abstracts Service; CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act; CFR = Code of Federal Regulations; CPR = Controlled Products Regulations; DOT = Department of Transportation; DSL = Domestic Substances List; EINECS = European Inventory of Existing Commercial Chemical Substances; EPA = Environmental Protection Agency; IARC = International Agency for Research on Cancer; IATA = International Air Transport Association; mg/Kg = milligrams per Kilogram; mg/L = milligrams per Liter; mg/m3 = milligrams per Cubic Meter; MSHA = Mine Safety and Health Administration; NA = Not Applicable or Not Available; NIOSH = National Institute for Occupational Safety and Health; NJTSR = New Jersey Trade Secret Registry; NTP = National Toxicology Program; OSHA = Occupational Safety and Health Administration; SARA = Superfund Amendments and Reauthorization Act; STEL = Short Term Exposure Limit; TDG = Transport Dangerous Goods; TSCA = Toxic Substances Control Act; WHMIS = Workplace Hazardous Materials Information System.

This is the end of MSDS # MARC-001

Appendix G
Spill Response Checklist

Appendix G
Spill Reponse Checklist
Metalico Aluminum Recovery, Inc. - Facility No. 7102372

SPILL INCIDENT DATE/TIME: _____ SPILL LOCATION: _____
 1st RESPONDER NAME: _____

ACTION	CHECK FOR COMPLETION	DESCRIBE ACTION
Document spill and contact the EC		
Report location of spill and oil-filled equipment involved		
Report description of spill		
Report material spilled		
Report volume spilled		
Report the impacted area, including the drainage area		
Report any immediate affected receptors (people, animals, waterways, etc.)		
Report the environmental conditions		
Report the equipment operational status		
Identify the source of spill or leakage		
Attempt to contain the spill and stop discharge at the source (only if safe to proceed)		
Deploy spill kit material downgradient from the spilled oil and near inlet to nearby. Materials in spill kit includes spill socks, sorbant pads and sorbant material		
POST-INCIDENT FOLLOW UP		
How/could the incident been avoided?		
What modifications, if any, should be made to SPCC/BMP practices and/or plans?		
Coordinate modifications as directed in the Plans		

Appendix H
Emergency Spill Contractors
and
Spill Kit Suppliers

Appendix H

Emergency Spill Contractors:

- 1. Safety-Kleen**
6741 VIP Parkway
Syracuse, NY, NY13211
Phone Number: (315) 455-1426
Fax Number: (315) 454-3217
24-Hour Emergency Response
(888) 375-5336
- 2. Environmental Products and Services, Inc.**
532 State Fair Blvd.
Syracuse, NY 13204
Phone: (315) 471-0503
24-Hour Emergency Response
(800) 843-8265
- 3. OP-TECH Environmental Services, Inc.**
6392 Deere Road
Syracuse, NY 13206
Phone: (315) 463-1643
24-Hour Emergency Response
(800) 225-6750
- 4. MARCOR Remediation, Inc.**
13 Dwight Park Drive
Syracuse, NY 13209-1029
Phone: (315) 451-6046
24-Hour Emergency Response
(800) 388-5933
- 5. Paragon Environmental Construction, Inc.**
8141 Route 11
Cicero, NY 13039
Phone: (315) 699-0840
- 6. Abscope Environmental, Inc.**
P.O. Box 487
1 Commercial Drive
Canastota, New York 13032
Phone: (315) 697-8437

Spill Kit Suppliers:

New Pig Corporation
One Pork Avenue
Tipton, PA 16684-0304
Phone: (800) 468-4647
www.newpig.com

Appendix I

Calculation of Secondary Containment Capacity

Appendix I
Calculation of Secondary Containment Capacity
Metalico Aluminum Recovery, Inc.
Facility No. 7102372
August 2008

Please Note:

At the time this SPCC plan was written, several oil storage areas and tanks required secondary containment as described in the Plan IP. Once secondary containment is installed, the secondary containment calculations provided below must be updated.

Tanks 101 and 102

The design of Tanks 101 and 102 incorporates an integral covered secondary containment dike that provides 110% containment of each primary tank. Because the tops of the dikes are covered to exclude rainwater, 110% of the primary tank volume is sufficient containment.

Tanks 103, 104, AD-1, AD-2, and AD-3 and Drum Storage Area D-3

Tanks 103, 104, AD-1, AD-2, and AD-3 and Drum Storage Area D-3 are installed in Storage Bin No. 7. Storage Bin No. 7 is equipped with a trench drain across the opening that drains to a 1,000 gallon holding tank. This tank is large enough to contain 110% of the largest container within the storage bin (300 gallons in Tank 104). Rain water is generally excluded from entering the trench drain due to a roof covering the storage bin.

Tanks 101 and 102 Transfer Containment

Per the IP a spill diversion/retention berm is to be constructed that will capture the most probable spill of 350 gallons plus freeboard for precipitation.

Drum Storage Areas D-1 and D-2

Per the IP secondary containment is to be provided for D-1 and D-2. Each of these secondary containment areas must be capable of containing at least 110% of a 55-gallon drum (or 61 gallons).

Transformers OFT-3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, and 15

Per the IP secondary containment is to be provided for the above listed transformers by a stormwater treatment device installed at the outlet of DA-1. The stormwater treatment

device must be capable of separating and containing at least 110% of the largest container that it is providing secondary containment for (303 gallons in OFT-3). The resulting minimum capacity is 334 gallons.

Appendix J
Monthly SPCC and PBS Inspection Log

App
Metalico Aluminum Recov
Monthly NYSDEC and SPCC Inspecti

Facility: Metalico Aluminum Recovery, Inc.
Location: 6223 Thompson Road; Syracuse, NY 13206
PBS No.: 7-437999
Date:
Name of Employee/Inspector:
Address of Employee/Inspector:
Signature:

Bulk Storage Inspecti

Tank #	Description
101	1,000-gallon
102	2,000-gallon
103	250-gallon
104	300-gallon
AD-1	180-gallon
AD-2	180-gallon
AD-3	180-gallon
D-1	55-gallon

INSTRUCTIONS:

Complete the following checklist for each oil drum or container storage area monthly. Mark "Y" for YES, "N" for NO, and "NA" for DOES NOT APPLY. Any items marked "N" require immediate corrective action. Document corrective action in the "COMMENT- CORRECTIVE ACTION" box.

ITEM	CONDITION	Bulk Storage Tanks					
		101	102	104	AD-1	AD-2	AD-3
TANK/DRUM/EQUIPMENT		Fleet fueling station		Storage Bin No. 7			
1	Is paint in good condition? (No corrosion, chipped or damaged paint present)						
2	Is the area around the container free of oil? (No evidence of stained soils or leaks present)						
3	Is tank/drum/equip. structure in good condition? (No evidence of rust or corrosion present)						
4	Does container appear to be operating normally? (No signs of bulging, cracks or damage to container)						
SPILL RESPONSE / SECONDARY CONTAINMENT							
5	Are good house keeping procedures followed? (Minor spillage is cleaned up immediately)						
6	Are the spill kit contents complete? (See Spill Kit Contents and Replenishment Log, Appendix L)	Complete inspection of spill kits on Appendix O - Monthly BMP Inspection Form					
7	Is secondary containment drain sealed closed? (If applicable)	N/A	N/A	N/A	N/A	N/A	N/A
8	Is secondary containment dry & free of oil & water? (Any water must be inspected for oil prior to draining)			N/A	N/A	N/A	N/A
PIPING, HOSES AND DISPENSERS							
9	Is paint in good condition? (No corrosion, chipped or damaged paint present)						
10	Is the area free of oil? (No evidence of stained soils or leaks present)						
11	Are all components in good condition? (No evidence of rust or corrosion present)						
12	Does component appear to be operating normally? (No signs of bulging, cracks or damage to component)						
13	Is piping free of leaks and in good condition? (No seeps or drips, staining on equipment or floor)						
LEAK DETECTION AND LEVEL GAUGING EQUIPMENT							
14	Leak detection and level gauging work properly?						
15	Cathodic protection system is working properly?	N/A	N/A	N/A	N/A	N/A	N/A
FOUNDATION							
16	Support foundation is stable and in good condition?						
FLOOR DRAINS & OIL/WATER SEPARATOR							
17	Floor drains are clear and able to free flow?	N/A	N/A		N/A	N/A	N/A
18	Oil/Water separator has available storage volume?	N/A	N/A	N/A	N/A	N/A	N/A
19	Holding tank has available storage volume?	N/A	N/A				

Comments and Corrective Action:

101	
102	
103	
104	
AD-1	
AD-2	
AD-3	
D-1	
D-2	

Chart Key

	D-3	
	OFT-1,2	
	OFT-3	
	OFT-4,5,6	
	OFT-7,8,9,10,11,12	
	OFT-13,14,15	
	OFT-16,17,18	

Appendix K
Records of Containment Dike Drainage

Secondary Containment Dike Drainage Monitoring Form

Metalico Aluminum Recovery, Inc.
Facility No. 7102372

Instructions: Prior to each discharge from a secondary containment system, the liquid including stormwater must be screened for contamination via visual and olfactory senses. If the screening indicates the presence of any oil, sheen, foam, or odor, the liquid must be disposed of as described in the facility SPDES Discharge Permit. Use the following decision tree in determining if the stormwater is contaminated or not.

Does the stormwater contain visible oil, sheen, foam, or color, or sensible odor? Has there been a spill or leak since the last discharge or is this the 4th discharge from a bulk storage containment system since previous sampling?

Stormwater may be discharged to the surface on-site without treatment.

Maintain log of stormwater discharges and contaminated water shipments below.

Maintain records of bill of lading for off-site shipment of contaminated water. Include any testing results (except visual and olfactory screening) with DMR submittal.

Refer to the SPDES Discharge Permit.

Analyze liquids for the parameters described in the permit and dispose of liquids as described in the SPDES Discharge Permit.

[illegible]

Appendix L
Required Spill Kit Contents

Appendix L Required Spill Kit Contents and Replenishment Log

Year: _____

The following contents should be contained in each spill kit and must be present and ready for use at all times. Kits are to be inspected monthly and recorded on monthly tank inspection logs (Appendix J). If something is missing, please inform the EC for replenishment and complete the log below when the item is replenished. If complete spill kits are purchased, spill kit should be capable of absorbing or containing a minimum of 50 gallons of oil.

Attention Spill Kit User: These supplies are for larger spills, not day to day minor jobs. Please use good judgment. If you use something that must be replaced, please inform the EC to get it replenished as soon as possible. If you use a reusable item, please clean and return it to the spill kit immediately after use.

Item #	Description	Quantity	Reusable or Disposable
1	Gloves & Disposable Boots	2 pair	Dependent on Use
2	Face Shield / Goggles	2 pair	Reusable
3	Spill Pillows	5 or more	Disposable
4	Sorbent Pads	60 or more	Disposable
5	Spill Booms	130 feet or more	Disposable
6	Bags (40 lb.) of Sorbent Material	2	Disposable
7	Non-Sparking Shovel or scoop	1	Reusable
8	Non-Sparking Scraper	1	Reusable
9	Hazardous Waste Disposal Bags, Ties, and Labels	10 or more	Disposable
10	Overpack Drum and Labels (minimum 60-gallons)	1	Disposable

Inspection Month	Items Needed	Date Replenished	Signature
January			
February			
March			
April			
May			
June			
July			
August			
September			
October			
November			
December			

Appendix M
Records of Tank Testing

Appendix M
Records of Tank Testing
Metalico Aluminum Recovery, Inc.
Facility No. 7102372

At the time this SPCC Plan was written, the facility did not require any tank integrity or pressure tests. If modifications are made to the facility requiring testing, then those records must be maintained in this appendix.

Appendix N

**Comprehensive Annual Facility
BMP Review**

APPENDIX N
ANNUAL COMPREHENSIVE SITE COMPLIANCE EVALUATION

Metalico Aluminum Recovery Facility

Instructions: This form should be completed on an annual basis and included in the SWPPP. If action is required, then this form and the Plan must reflect the actions taken.

Area Inspected	Location	Inspection Procedure	BMPs Required
Materials Handling Operations and Scrap Metal Processing	Site wide	Check incoming vehicles to ensure they are properly closed and/or covered. Ensure that all non-ferrous metals are stored indoors, and that all other metals are stored on concrete pad. Check scrap piles in yard to ensure they do not exceed heights established under zoning code. Check scrap processing equipment to ensure that no leaks or malfunctions are present.	
ASTs and Fueling Areas	As shown on Figure 2	Complete Monthly AST inspection form per SPCC Plan. Check for staining or spillage in containment area, on tank and near dispenser. Inspect locks, spill kits and make sure hose is secure and away from vehicle path. Inspect for liquid level capacity within the containments.	
Truck and Employee Parking Areas	Southern and eastern portions of the site	Ensure entrance is swept to remove accumulated sediment and debris. Check for signs of leaking fluids or oil or previous staining and ensure that leaks are immediately contained by drip pans or other means.	
Stormwater Drainage Swales	East and west site boundaries	Check for stability (vegetation) and accumulated sediment. Remove sediment and replace vegetation if necessary.	
Stormwater Outfalls and Closed Drainage (Outfall 001)	Northern portion of the site	Check Stormwater Outfall for operation (i.e. open, clean) and water quality by (odors, sheens, clarity, and floating solids). Ensure that no buildup of sludge or debris is occurring. Remove if these materials exceed 50 percent of capacity.	
Waste Storage and Handling Areas (DA1)	As shown on Figure 2	Ensure that spilled or mishandled wastes or debris are cleaned up immediately and disposed of properly. Check that dumpsters remain covered when not in use and are emptied frequently enough that they do not exceed storage capacity.	

APPENDIX N
ANNUAL COMPREHENSIVE SITE COMPLIANCE EVALUATION
Metalico Aluminum Recovery Facility

Instructions: This form should be completed on an annual basis and included in the SWPPP. If action is required, then this form and the Plan must reflect the actions taken.

Area Inspected	Location	Inspection Procedure	BMPs Required
Maintenance Shop and Storage	Maintenance building (indoors)	Inspect for general cleanliness, and sweep or clean shop floor as necessary. Batteries, motor oil, automotive fluids, and regulated materials shall be stored inside the facility within appropriate containment to avoid exposure to stormwater.	
Wet or Oily Aluminum Turnings/Chips Storage Areas (DA1)	As shown on Figure 2	Ensure that oily turnings and chips are stored in designated areas under cover and that oil does not migrate outside the trench drain area. Inspect trench drains and tanks used to capture cutting oils.	
Transformer Pad Areas	As shown on Figure 2	Visually examine transformers for signs of leakage and other damage.	
Loading Dock Areas	Perimeter of Main Building	Inspected daily for evidence of spills, accumulated debris, and materials exposed to stormwater. Ensure regular pumpout of fluid recovery tank.	
Spill response kits	As shown on Figure 2	Inspect all components, make sure kit is accessible	
Lime-Injected Baghouse Areas	Surrounding the baghouse (see Figure 2)	Ensure that spilled particulate matter is cleaned up from the baghouse area immediately to avoid exposure to stormwater. Inspect facility to identify any conditions that might lead to the release of particulate material.	

Name and Title of Inspector: _____

Signature: _____ Date: _____

Appendix O

Monthly BMP Inspection Form

Appendix O - Monthly BMP Inspection Form

Metalico Aluminum Recovery, Inc.
6223 Thompson Road
Syracuse, New York 13206

This form is designed to document MARI-Syracuse's monthly inspection activities as described in the facility's BMP Plan. The inspector should check either "Yes" or "No" as appropriate for each item. If the check is in a shaded box, then additional information must be provided in the "Notes & Details" section. Once completed, this form must be maintained in Appendix O of the Plan.

Inspector:

Name

Title

Signature

Date

SITE-WIDE BMP ITEMS

Good Housekeeping	Yes	No
1) Are all regulated materials including batteries, motor oil and other automotive fluids stored inside the facility when practicable to their prevent exposure to precipitation?		
2) Are all interior and exterior areas used for the storage of wastes and regulated substances inspected and maintained on a routine basis?		
3) Are the floor surfaces and outdoor paved and concrete areas swept each week to prevent any build-up of dust/sediment, and any trash and debris encountered picked up and appropriately disposed?		
4) Do employees take proper care during the use, storage and handling of regulated substances to prevent any spills or direct releases of these substances to the environment?		
5) Are all waste materials generated on-site, including used oil and cleaning solvents, collected and stored in appropriate containers prior to their being picked-up for off-site recycling or disposal?		
6) Are spilled and/or mishandled wastes cleaned-up as soon as practicable?		
7) Are there any solvents, detergents, wash water, or other fluids poured down drains or allowed to discharge to the on-site storm sewer system or onto the ground surface?		
8) Are all employees involved in industrial operations trained annually on basic pollution prevention techniques and procedures?		

Preventative Maintenance	Yes	No
1) Are routine inspections of the MARI-Syracuse facility completed each month to ensure that all BMPs are being properly implemented? (i.e. Monthly BMP Inspection)		
2) Are wastes, contaminants or debris encountered during the routine inspections immediately cleaned up and appropriately managed?		

Preventative Maintenance (continued)	Yes	No
3) Are areas where industrial activities and/or regulated substances exposed to precipitation regularly observed to ensure that no contaminants can be seen entering or migrating toward the on-site storm sewer system? (i.e. Weekly Inspections)		
4) Are the storm sewer inlets and associated piping, including the Outfalls, inspected and maintained on a monthly basis to prevent any build-up of sediment or other conditions that could lead to the direct discharge of contaminants to Ley Creek?		

Spill Prevention & Response	Yes	No
1) Are the following spill kits complete and ready for use (see Appendix L for the required spill kit contents and replenishment log)?		
a. Fleet Fueling Station Kit		
b. Non-Ferrous Receiving Kit		
c. Chip Storage Area Kit		
d. Storage Bin No. 7 Kit (Auto-dismantler)		
e. Scrap Processing Area Kit		
f. Loading Dock Kits (2)		
g. CAMU Pump House Kit		
h. Main Substation Kit		
i. Blockhouse Kit		
j. Maintenance Area Kit		
2) Is the spill equipment mentioned above replenished after each use?		
3) Are employees aware of, and trained in, the appropriate notification/response procedures that are to be enacted whenever an on-site spill occurs?		
4) Have all incidents that have occurred since the last monthly inspection been investigated and assessed to determine if BMP changes are necessary?		

AREAS SPECIFIC BMP ITEMS

Parking Areas & Access Drives	Yes	No
1) Are all on-site parking areas and access drives inspected for leaks, spills and other potential stormwater contaminants on a monthly basis and are any spills, wastes, or debris identified during these inspections immediately cleaned-up and appropriately disposed of by facility personnel?		
2) Is the main access drive (primary truck traffic route) cleaned (scraped and/or swept) at least monthly?		

Scrap Storage Yard	Yes	No
1) Is all incoming scrap material screened and/or inspected for the presence of residual fluids and/or other potential stormwater contaminants prior to being stored within the scrap yard?		
2) Is the scrap yard equipment inspected each month for spills, leaks and excessive corrosion and are any spills or leaks discovered during these inspections immediately cleaned up using absorbent material and/or other spill equipment?		
3) Are the stockpiles within the yard area visually monitored to ensure they do not extend above the zoning height restriction which limits the amount of scrap materials stored within the yard exposed to precipitation?		
4) Are all drainage inlets in the scrap storage yard equipped with an inverted elbow, which provides oil/water separation in the event that oil is spilled into the drainage inlet?		
5) Are oil absorbent pads installed in all drainage inlets in the scrap storage yard and are they manually changed every Monday, Wednesday, and Friday, with the removed pads being placed in the refuse dumpster?		

Scrap Processing Areas

	Yes	No
1) Is the equipment used for the processing of scrap materials maintained on a routine basis in accordance with manufacturer recommendations to ensure proper operation and prevent conditions that could lead to leakage and contamination of the stormwater?		

Scrap Processing Areas (continued)

	Yes	No
2) Do operators inspect their equipment for leaking or damaged parts at the start and end of each work day and are any faulty parts identified repaired or replaced as soon as practicable?		
3) Are processing areas inspected for leaks and spills on a monthly basis and are any spills encountered during these inspections immediately cleaned up to prevent any corresponding contaminants from reaching the on-site storm sewer system?		
4) Are all drainage inlets in the scrap storage yard equipped with an inverted elbow, which provides oil/water separation in the event that oil is spilled into the drainage inlet?		
5) Are oil absorbent pads installed in all drainage inlets in the scrap storage yard and are they manually changed every Monday, Wednesday, and Friday, with the removed pads being placed in the refuse dumpster?		

Wet/Oily Aluminum Turnings/Chips Storage Area

	Yes	No
1) Are all aluminum turnings/chips stored in the designated areas under cover and are these areas kept in a neat and orderly manner and inspected daily to ensure that no cutting fluids or turnings have migrated outside of the trench drain confines?		
2) Are the tanks used to capture and collect drained cutting fluids from the covered structures inspected and maintained each week to ensure that overfilling does not occur and is the fluid inside the tanks removed (pumped-out) and disposed of as needed to ensure adequate storage space remains available?		
3) Are the trench drains inspected on a weekly basis to ensure they are unobstructed and have a clear flow path for fluids?		

Maintenance Shop & Storage Building

	Yes	No
1) Are all regulated substances (incl. petroleum products, solvents, etc.) stored inside the shop whenever possible to prevent their exposure to precipitation and are these materials stored in a neat and orderly manner?		
2) Are the maintenance shop and storage building inspected for leaks and spills on a weekly basis?		
3) Is the spill response equipment including absorbent material, brooms, shovels, etc. present inside the shop to allow for the immediate containment and clean-up of spills?		
4) Do employees use caution when using hydraulic oil or grease inside the shop and during the transfer of products to prevent any accidental petroleum releases from occurring and are discarded fluids placed in the waste oil storage tank?		
5) When performing maintenance/repair activities outdoors, are drip pans placed under vehicles/equipment to collect any leaked or drained fluids and are used parts placed into non-leaking containers immediately upon removal from their vehicles/equipment to ensure that any residual fluids or grease present on these parts is contained and are these containers covered and/or moved inside the facility until the parts can be picked-up for recycling or disposal?		
6) Is the maintenance of facility forklifts and processing vehicles performed by outside fleet maintenance contractors and are any waste oils generated during these maintenance activities removed from the site by the contractor performing the service?		

Loading Docks

	Yes	No
1) When trucks deliver aluminum turnings to the covered loading dock in the northeast corner of the building, are the drains observed to determine if fluids need to be contained in the pump house by manually shutting off the pump?		
2) Are spill kits complete and kept on-hand and readily available for use within all dock areas to allow for the immediate containment and clean-up of spills?		

Loading Docks (continued)

Yes No

3) Are the loading docks inspected weekly for the presence of spilled fluids, refuse and debris?		
--	--	--

Petroleum Bulk Storage Areas

Yes No

1) Are monthly inspection conducted and documented in Appendix J?		
2) Is the Oil Delivery/Collection Procedures Checklist (Appendix S) completed each time oil is delivered or collected at the Site?		

Waste Storage & Handling Areas

Yes No

1) Are the dumpsters used for the storage of scrap wood and refuse stored in the scrap processing area where precipitation that falls on this area flows into drainage inlets equipped with inverted elbows for oil/water separation and absorbent pads?		
2) Do employees use caution when transferring materials into the dumpsters to ensure that all articles of waste are appropriately contained?		
3) Are the areas surrounding the dumpsters inspected and maintained on a weekly basis?		

Transformer Areas

Yes No

1) Are the oil filled electrical transformers inspected on a weekly basis for signs of leakage and other damage (only those that are part of Section 13.0 - Spill Contingency Plan) and documented in Appendix P?		
---	--	--

SCRAP RECYCLER BMP ITEMS**Receiving of Scrap/Waste Materials**

Yes No

1) Does the facility follow an inbound recyclable and waste material control program in order to minimize the potential for receiving materials that may be significant pollutant sources?		
2) Are all incoming shipments of scrap metal/waste materials screened and inspected (visually examined) by the facility prior to its entering the scrap yard to ensure that there are no existing residual fluids or other potential sources of contaminants included within the shipment?		
3) Are the inspection/screening and waiting areas inspected daily for spills caused by leaking trucks or draining of residual fluids from incoming scrap?		
4) When applicable, do customers/suppliers provide written certification to the facility that the scrap materials being brought onto the site do not contain hazardous substances as defined under CERCLA (except for fluids contained in spent batteries)?		
5) Is a sign posted at the front of the weigh station near the main site entrance to notify customers/suppliers of the restricted scrap materials and conditions for acceptance by the facility (including that scrap items must be drained of all fluids and gases prior to being brought onto the site)?		
6) Are signs posted in the receiving area and scale area with information on the draining and proper recycling/disposal of fluids prior to delivery to the facility (e.g., from transformers or other containers); as well as information regarding the proper management of refrigerants that are contained in appliances?		

Covered/Indoor Scrap Storage Areas		Yes	No
1)	Are the areas used for storing and processing scrap inside the warehouse inspected and maintained (swept and picked-up) on a weekly basis?		
2)	Are all wastewaters generated from floor cleaning or other activities inside the warehouse contained and appropriately managed?		

Lead-Acid Battery Storage & Handling		Yes	No
1)	Are the used lead-acid batteries that are delivered to the facility managed separately and remain segregated from the other on-site scrap materials and are the batteries unloaded on the paved asphalt surface at the non-ferrous scrap receiving area and immediately inspected for cracks or leaks by facility personnel?		
2)	Are damaged or leaking batteries carefully placed into a non-leaking plastic container to allow for the capture and/or containment of any leaking fluids and are containers used for the storage of damaged or leaking batteries appropriately labeled and remain stored inside the warehouse until the batteries can be picked-up for off-site disposal?		
3)	Are undamaged, non-leaking batteries placed onto wooden pallets and secured with shrink wrap, prior to being moved into the warehouse where they will remain stored until they are picked up and transported off-site for recycling by a contracted waste hauler?		

AUTO SALVAGE BMP ITEMS

Vehicle Dismantling Areas		Yes	No
1)	Are scrap vehicles inspected for leaks immediately upon their arrival at the site and are any leaking parts/components identified promptly removed?		
2)	Are fuel, refrigerants, and batteries removed from vehicles as soon as practicable?		
3)	Are all vehicle draining and dismantling activities conducted under cover inside the dismantling structure and is the trench drain along the face of the structure clear and operating properly?		
4)	Are collected automotive fluids stored in separate containers with appropriate labels and kept inside the structure to avoid any exposure to precipitation?		
5)	Are components checked to ensure that internal fluids have been removed		
6)	Are fluids completely drained from vehicles prior to crushing?		
7)	Are batteries inspected for leaks or cracks immediately upon their removal from vehicles and are any batteries which are determined to be cracked or leaking placed into a covered, non-leaking container and stored inside the facility for proper disposal?		
8)	Are all containers used for the storage of automotive fluids and other regulated substances inside the covered structure and are fluids collected in drip pans transferred into appropriate containers as soon as possible?		
9)	Are used oil and other wastes generated from vehicle dismantling and maintenance activities (including greasy rags, spent solvents and degreasers, oil filters, etc.) appropriately managed?		
10)	Are components containing hazardous substances (i.e. Mercury switches/batteries removed and placed in labeled containers for appropriate management, when applicable?		
11)	Are air conditioner refrigerants recovered using USEPA-certified recycling equipment?		

Yes No

Daily & Weekly Inspections		Yes	No
1)	Are facility employees performing the daily inspections of the following areas: 1) turnings storage areas; 2) scrap receiving areas; 3) scrap vehicle storage area; and 4) vehicle dismantling area?		
2)	Are the weekly inspections being performed and documented in Appendices Q and P?		

Yes No

Note: If any of the shaded boxes above are checked, then additional information related to the response must be provided below, including measures necessary to correct the issue, and if applicable, the changes that must be made to the SPCC/BMP Plan. Refer to Section 11.0 of the Plan for information related to Plan Amendments. Refer to Air Permit and OM&M Plan for monthly label inspection information.

This image shows a single sheet of white paper with horizontal blue or grey ruling lines, typical of notebook paper. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

Appendix P

**Weekly Inspection Log for
Oil-filled Operational Equipment**

Appendix P
Weekly Inspection Log for Oil-Filled Operational Equipment
Metalico Aluminum Recovery, Inc. - Facility No. 7102372

Year: _____

Oil Filled Equipment:	Location
OFT-1	Main Substation
OFT-2	Main Substation
OFT-16	Metal Shed at CAMU
OFT-17	Metal Shed at CAMU
OFT-18	Metal Shed at CAMU

Note to inspector:

Initial the boxes below certifying that the oil filled equipment has been inspected for the corresponding week and no spills of oil were noted. Contact the facility Emergency Coordinator for guidance in case of spill emergency.

Inspect each piece of equipment for evidence of leaks, pooled oil or water and normal operation of the equipment. Note any damage to equipment in the comments section. If a leak is noted, notify the Emergency Coordinator immediately.

Week #	Date	OFT-1	OFT-2	OFT-16	OFT-17	OFT-18	Comments
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
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17							
18							
19							
20							
21							
22							
23							
24							
25							
26							

Appendix P
Weekly Inspection Log for Oil-filled Operational Equipment
Metalico Aluminum Recovery, Inc. - Facility No. 7102372

Year: _____

Oil Filled Equipment:	Location
OFT-1	Main Substation
OFT-2	Main Substation
OFT-16	Metal Shed at CAMU
OFT-17	Metal Shed at CAMU
OFT-18	Metal Shed at CAMU

Note to inspector:

Initial the boxes below certifying that the oil filled equipment has been inspected for the corresponding week and no spills of oil were noted. Contact the facility Emergency Coordinator for guidance in case of spill emergency.

Inspect each piece of equipment for evidence of leaks, pooled oil or water and normal operation of the equipment. Note any damage to equipment in the comments section. If a leak is noted, notify the Emergency Coordinator immediately.

Week #	Date	OFT-1	OFT-2	OFT-16	OFT-17	OFT-18	Comments
27							
28							
29							
30							
31							
32							
33							
34							
35							
36							
37							
38							
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52							

Appendix Q
BMP Weekly Inspection Form

APPENDIX Q
WEEKLY FACILITY INSPECTION FORM

Metalico Aluminum Recovery, Inc.
Facility No. 7102372
Syracuse, New York

Instructions: This form should be completed on a weekly basis and included in the SPCC/BMP binder. If action is required, then this form and the Plan must reflect the actions taken.

DATE	INSPECTED BY	OTHERS PRESENT		
Area Inspected	Inspection Procedure	Acceptable	Unacceptable	Action Required (if Unacceptable)
<i>Paved Areas and Floor Surfaces</i>				
Main Entrance	Maintain area free of debris, turnings, sediment. Sweep up accumulated materials and properly dispose of them.			
Scale area				
Turnings storage areas	Ensure turnings are consolidated and minimize exposure to stormwater. Sweep up and consolidate accumulated turnings.			
Scrap processing areas	Maintain area free of debris, turnings, sediment. Sweep up accumulated materials and properly dispose.			
CAMU area				
Baghouse and western storage areas	Maintain area free of particulate dust. Sweep up accumulated materials and properly dispose.			
Office parking areas	Maintain area free of debris, turnings, sediment. Sweep up accumulated materials and properly dispose.			
Interior floor surfaces				

APPENDIX Q
WEEKLY FACILITY INSPECTION FORM

Metalico Aluminum Recovery, Inc.
Facility No. 7102372
Syracuse, New York

Area Inspected	Inspection Procedure	Acceptable	Unacceptable	Action Required (if Unacceptable)
Fluid Recovery Tank Volume				
North chip storage area tank	Monitor the level of fluids inside each tank to prevent overfilling. Ensure that tanks are pumped out by an approved waste hauler before they approach full capacity.			
Northwest chip storage area tank				
Paved area 2000-g tank				
Auto dismantling storage area tank				
Maintenance Shop and CAMU Storage				
Maintenance shop floor	Maintain area free of debris, turnings, sediment. Sweep up accumulated materials and properly dispose of them.			
Maintenance shop product storage	Ensure that petroleum and hazardous products are stored indoors in secure locations on spill pallets.			
CAMU storage building	Maintain area free of debris, turnings, sediment. Sweep up accumulated materials and properly dispose of them.			
Loading Docks				
Door 1 and 2 docks and truck scale	Ensure dock area is kept free of debris, sediment, dust. Sweep and dispose of properly as necessary. Ensure that spilled fluids are either cleaned up immediately or allowed to enter			
Door 4 and 5 docks				

APPENDIX Q
WEEKLY FACILITY INSPECTION FORM

Metalico Aluminum Recovery, Inc.
Facility No. 7102372
Syracuse, New York

Area Inspected	Inspection Procedure	Acceptable	Unacceptable	Action Required (if Unacceptable)
Door 6 and 7 docks	trench drains. Verify pump is shut off at pump house if fluid enters trench drains in order to contain liquid in underground tank.			
Door 10, 11, and 12 docks				
Dumpster Area				
Wood dumpster	Ensure that ground surrounding dumpsters is free of litter and debris, that dumpsters are closed and/or covered, and that the dumpster containers are not filled to beyond their capacity.			
General refuse dumpster				
Scrap Storage and Processing Areas				
Non-ferrous receiving storage	Ensure area is kept free of debris, and dust. Sweep and dispose properly as necessary. Consolidate all material storage to designated area.			
Battery storage area	Verify that all batteries are securely stored in a manner to avoid spills. Ensure that spilled fluids are cleaned up promptly with attention to MSDS.			
Indoor scrap storage near maintenance	Ensure area is kept free of debris, and dust. Sweep and dispose properly as necessary. Consolidate all material storage to designated area.			
Irony aluminum area				
Loose light iron area (west wall)	Ensure oil absorbent pads in scrap storage drainage areas are replaced each Monday, Wednesday, and Friday. Check height of scrap piles to ensure it remains in compliance with zoning code. Verify that			
Heavy steel area (west wall)				
Loose light iron area (east wall)				

**APPENDIX Q
WEEKLY FACILITY INSPECTION FORM**

**Metalico Aluminum Recovery, Inc.
Facility No. 7102372
Syracuse, New York**

Area Inspected	Inspection Procedure	Acceptable	Unacceptable	Action Required (if Unacceptable)
Heavy steel area (east wall)	scrap processing equipment is being checked for leaks and/or damaged parts at the beginning and end of each work day.			
Daily Inspection Verification				
Turnings drains and storage areas	Verify that daily inspections are being performed as required.			
Scrap receiving area				
Scrap vehicle storage area				
Scrap drainage inlet				
Vehicle dismantling area				
Baghouse Opacity Check				

Appendix R
Annual Employee Training Log

Date: _____
Training Conducted By: _____

Each annual meeting may cover additional topics, and the syllabus from each meeting is to be attached to this training sign-in sheet as a record of what was covered. The following employees have attended the Annual Spill Prevention and BMP Training Meeting for the year listed above:

[illegible]

Appendix R

Annual Employee Spill Prevention Training Meeting

Metalico Aluminum Recovery, Inc.

Facility No. 7102372

Syracuse, New York

Date: _____

Topics to Discuss

1. General Overview of the Facility's Spill Prevention Control and Countermeasure (SPCC) Plan
 - a. Regulations Behind the SPCC Plan
 - b. Review of the Provisions of the Facility's SPCC Plan
 - c. Goals of the SPCC Plan
2. Spill Prevention Equipment
3. Tank Inspections and Record Keeping
4. Spill Response Procedures
5. Spill Cleanup Procedures
6. Prior Spill Response Critique (If Applicable)
7. Issues Regarding Current Fuel Handling and Storage at the Facility
8. Updates to the SPCC Plan
9. Employee Suggestions for Improvements
10. "Mock" Spill Drill

Appendix R

Annual Employee Best Management Practice (BMP) Training Meeting

Metalico Aluminum Recovery, Inc.

Facility No. 7102372

Syracuse, New York

Date: _____

Topics to Discuss

1. General Overview of the Facility's Best Management Practice (BMP) Plan
 - a. Regulations Behind the BMP Plan (State Pollutant Discharge Elimination System)
 - b. Review of the Provisions of the Facility's BMP Plan
 - c. Goals of the BMP Plan
2. Types of Best Management Practices
 - a. Pollution Prevention Team
 - b. Reporting of BMP Incidents
 - c. Risk Identification and Assessment
 - d. Employee Training
 - e. Inspections and Records
 - f. Security
 - g. Preventative Maintenance
 - h. Good Housekeeping
 - i. Materials/Waste Handling, Storage, and Compatibility
 - j. Spill Prevention and Response
 - k. Erosion and Sediment Control

l. Management of Runoff

m. Street Sweeping

3. Areas in which BMPs apply

a. Indoor floor surfaces

b. Paved areas

c. Storage areas

d. Spill response kits

e. Fluid recovery tanks

f. Maintenance shop

g. Loading docks

h. CAMU area

i. Dumpsters/waste storage and handling

j. Scrap processing areas

k. Electrical transformers

l. Aluminum turnings and chips storage

m. Lead-acid battery storage and handling

Appendix S
Oil Delivery Procedures Checklist

Appendix S
Oil Delivery/Collection Procedures Checklist
Metalico Aluminum Recovery, Inc.
Facility No. 7102372

Form to be completed for each oil delivery/pickup

Employee Name: _____
Supplier Name: _____
Name of Driver: _____

Date: _____
Weather Conditions: _____
Time On-site: _____
Time Off-site: _____

Receiving Tank # _____
Delivery Contents _____
Delivery Volume _____ (gallons)
Available Capacity _____ (gallons)

Location: _____

For all oil transfer operations at the facility, complete the following checklist:

PROCEDURE	COMPLETE (Y/N)	COMMENTS
A designated facility employee shall be present to observe all oil deliveries to (or removal from) all PBS tanks to ensure that proper spill prevention procedures are followed. All delivery personnel should be familiar with loading and unloading procedures, outlined below, prior to making a delivery.		
A facility employee must inspect and drain any containment structures (if applicable) in advance of oil transfer. Install catch basin drain blocker on loading dock catch basin prior to deliveries to Tank 010.		
A facility employee shall inspect shipping documents to verify type and quantity of oil being delivered.		
Identify fill port and receiving tank for oil being unloaded.		
Verify receiving tank has sufficient capacity for volume of oil being delivered.		
Establish grounding/bonding wires.		
Secure tank truck with wheel chocks and interlocks.		
Place oil drip container under the appropriate fill ports as necessary. Connect to fill port and unload oil. Immediately verify that the oil is transferring to desired tank.		
Check piping and tank including valves and connections for leaks during transfer.		
Facility personnel must be present at all times during deliveries/collection to insure that oil transfer is terminated immediately when receiving tank is full. Check tank and piping system to verify all valves in closed position. Do not uncouple hose until fill/collection line has been properly emptied.		
After unloading oil, make sure lines are fully emptied. Disconnect grounding/bonding wires. Uncouple hose from fill port and cap the fill line. Secure all valves controlling the flow of oil in the closed position.		
Verify delivery vehicle is disconnected from tanks and piping prior to exiting from the facility.		
Once the delivery/collection vehicle has exited the facility, a facility employee shall inspect the loading area to insure that no oil has been leaked or spilled during the delivery. Any spilled or leaked oil shall be contained and cleaned up immediately. Drain blocker shall be removed from loading dock catch basin (if applicable).		
Document and keep records of delivery including:		Employee Signature
1. Certification that a facility employee responsible for transfer has reviewed the delivery procedures with delivery personnel.		
2. Document delivery contents and volume delivered.		
3. Document the receiving tank was inspected and had capacity to receive delivery.		
4. Document date and time of delivery and time delivery vehicle enters and exits the facility		

This is a summary of the required delivery/collection procedures for oil transfers at the facility. For more detailed oil delivery/collection procedures, refer to Section 10.0 of the facility's SPCC Plan.

Appendix T
SPCC/BMP Review and Amendment Logs

SPCC Review Log

Management Review:

Review Date _____

Name (Please print) _____

Signature _____

By signature, I have completed a review and evaluation of the SPCC Plan for MARI Facility No. 7102372 on the date indicated above, and the plan **will (will not)** require amendment as a result.

Management Review:

Review Date _____

Name (Please print) _____

Signature _____

By signature, I have completed a review and evaluation of the SPCC Plan for MARI Facility No. 7102372 on the date indicated above, and the plan **will (will not)** require amendment as a result.

Management Review:

Review Date _____

Name (Please print) _____

Signature _____

By signature, I have completed a review and evaluation of the SPCC Plan for MARI Facility No. 7102372 on the date indicated above, and the plan **will (will not)** require amendment as a result.

Management Review:

Review Date _____

Name (Please print) _____

Signature _____

By signature, I have completed a review and evaluation of the SPCC Plan for MARI Facility No. 7102372 on the date indicated above, and the plan **will (will not)** require amendment as a result.

MANAGEMENT REVIEW:

Review Date _____

Name (Please print) _____

Signature _____

By signature, I have completed a review and evaluation of the SPCC Plan for MARI Facility No. 7102372 on the date indicated above, and the plan **will** **(will not)** require amendment as a result.

In the event that the facility undergoes a modification that alters the contents of this BMP Plan, including, but not limited to, construction activities; change in ownership; fabrication or alteration of a process, an amended BMP plan shall be prepared and certified by a licensed PE familiar with the facility. The amended BMP Plan shall replace this Plan. The reason, date and impacted pages of the BMP Plan amendments are to be included in the log given in Table T-1, below.

In addition, if more than 1,000 gallons of oil is discharged into or upon the "Navigable Waters of the United States" or adjoining shorelines in a single spill event, or in two (2) spill events of greater than or equal to 42 gallons of oil occurring within a 12 month period, the EPA shall be notified, as discussed in Section 5.2, and the EPA Regional Administrator may require the Facility to amend this BMP Plan. Within thirty (30) days of EPA notice to amend the plan, the PE certified amendment must be forwarded to the EPA.

Table T-1
SPCC Plan Amendment Log

[illegible]

**The implementation date must be established within six (6) months after the facility change has occurred.*

Best Management Practice (BMP) Plan Revision Form

Date of Revision January 2009

Revision No. 1

Sheet No. 1 of 1

This form is to be used when revisions to the current BMP Plan are required by the site's SPDES Discharge Permit (NY-026-1947). The completed form must be inserted into the BMP Plan and made part of the on-site document.

Reason for Revision(s): Revisions requested by the NYSDEC: ☒ YES ☐ NO

Original SWPPP prepared by Hazard Evaluations, Inc. has been revised based upon
requests from NYSDEC in letter dated March 24, 2008.

Describe the Revision(s) to the SWPPP:

Full amendment to all sections of SWPPP and inclusion of new requirements.

Best Management Practice (BMP) Plan Revision Form

Date of Revision _____

Revision No. _____

Sheet No. _____ of _____

This form is to be used when revisions to the current BMP Plan are required by the site's SPDES Discharge Permit (NY-026-1947). The completed form must be inserted into the BMP Plan and made part of the on-site document.

Reason for Revision(s): Revisions requested by the NYSDEC: YES NO

Describe the Revision(s) to the SWPPP:

Appendix U
NYSDEC PBS Regulation
Compliance Checklist

Appendix U
NYSDEC PETROLEUM BULK STORAGE REGULATION (6 NYCRR Part 612-614)
ABOVEGROUND STORAGE TANK COMPLIANCE CHECKLIST

Complete form annually for general compliance check with NYSDEC regulations

Site Name _____ Facility No. 7102372 _____ Date _____
 Owner _____ Metalico Aluminum Recovery, Inc. _____ Inspected By _____
 Tank # _____ Contents _____
 Capacity _____ (gallons) _____ Location _____
 Tank Type _____ Double Wall? Yes No
 Secondary Containment? Yes No

NYSDEC Compliance	YES	NO	N/A	COMMENTS
Is tank properly registered? (612.2)				
Color coded fill ports? (613.3(b))				
Shut-off valves? (613.3(c)(1)&(2))				
Gauge or High-level alarm? (613.3(c)(3))				
Is tank labeled at gauge/alarm with:				
(design cap., working cap., tank ID#)?				
Check valve for pump filled tanks? (613.3(c))				
Flow control for gravity drained tank? (613.3(c)(5))				
Secondary Containment? (613.3(c)(6))				
Equipment in good working order? (613.3(d))				
AST Monthly Inspections? (613.6)				
AST Ten Year Inspections? (613.6)				
(not required for tanks entirely aboveground i.e. on racks, cradles, or stilts)				
Properly report any spills or discharges? (613.8)				
Properly close out-of-service tanks? (613.9)				
Are all new or modified tanks (post 1985) in accordance with 6 NYCRR Part 614:				
New tank requirements? (614.9)				
Impermeable barrier under tank? (614.10)				
Leak monitoring under tank? (614.11)				
Installation of aboveground facilities? (614.13)				
New underground piping standards? (614.14)				









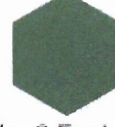
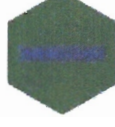


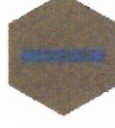


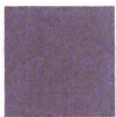


Appendix V
Tank Label Requirements

Appendix V

API Color Codes Excerpted from API Practice 1637

4

API RECOMMENDED PRACTICE 1637

GASOLINES		DISTILLATES		
Unleaded		Ultra Low Sulfur	Low Sulfur	High Sulfur
High grade				
			Diesel	
Middle grade				
			No. 1 Fuel Oil	
Low grade				
			No. 2 Fuel Oil	
				
			Kerosene	
ALCOHOL-BASED FUELS		BIODIESEL		
	Note: See 2.5.1 for specific labeling requirements		Note: See 2.4.1 for specific labeling requirements	
USED OIL	OBSERVATION OR MONITORING WELL		VAPOR RECOVERY	
				



Engineers • Environmental Scientists • Planners • Landscape Designers

Project Memorandum

Date: 10/11/2006
To: FILE
Cc:
From: JJR
File:
RE: Fuel Storage and Dispensing Signage and Labeling Requirements

Items 1, 2, 3, 4 & 5 only apply to the fleet fueling and dispensing area. Items 6, 7, 8, & 9 apply to all tanks.

All warning and safety signage shall be provided and constructed in compliance with NFPA Chapters 30 & 30A, and New York State Fire Code Chapters 22, 27 and 34, and any other local, State or Federal requirements. Signage shall be metal backed construction, permanently mounted and of the color and sizes dictated by the applicable code and regulation.

1) Flammable Liquid General Requirements:

Labeling and Signage Style. Durable metal backed construction; white lettering on red background. Letters shall be not less than 3 inches in height and 0.5 inches in stroke. For warning of the hazard of flammable liquids:

"DANGER – FLAMMABLE LIQUIDS"

Location. Post conspicuously on all aboveground tanks and all dispenser areas or as additionally required by code enforcement official. **Piping** containing flammable liquids shall be identified in accordance with ANSI A13.1.

Identification. Color coding or other approved identification means consistent with Title 6 NYCRR Part 613.3(b) shall be provided on each **loading and unloading riser for flammable or combustible liquids** to identify the contents of the tank served by the riser.

2) Emergency Disconnect Switches. All emergency disconnect switches shall be distinctly labeled as:

"Emergency Fuel Shutoff"

3) Dispensing Operations

Operating instructions. Dispenser operating instructions shall be conspicuously posted in approved locations on every dispenser and shall indicate the location of the emergency controls.

4) Provide signage with instructions for emergency procedures:

"In Case of Fire, Spill or Release:

1. Use Emergency Pump Shutoff

2. Report The Accident to:

Fire Department Telephone No.: 911

New York State Dec Spill Hotline No.: (800) 457-7362

Facility Address:

Facility Name

Address

Phone

Emergency Phone

5) **Warning signs.** Posted conspicuously in the sight of each dispenser in the fuel-dispensing area, signage that is metal backed construction, signage warning against the following:

a) **"DANGER – COMBUSTIBLE LIQUIDS"**

b) **"DANGER – FLAMMABLE LIQUIDS"**

c) **"WARNING"**

"It is illegal and dangerous to dispense fuel into unapproved containers"

"Smoking is prohibited"

"The engine shall be shut off during the refueling process"

"No filling of portable containers in or on a motor vehicle

Place container on ground before filling"

"Discharge your static electricity before fueling by touching a metal surface away from the nozzle"

"Do not re-enter your vehicle while gasoline is pumping"

"If a fire starts do not remove nozzle – back away immediately"

"Do not allow individuals under licensed age to dispense fuel"

6) **Hazard identification signs.** Unless exempted by the code enforcement official, visible hazard identification signs in accordance with NFPA 704 for the specific material contained shall be placed on all aboveground tanks. The hazard placarding shall include NFPA Hazard Diamond at a minimum.

All tanks should also be labeled with fire hazard: **"DANGER – COMBUSTIBLE LIQUIDS", or "DANGER – FLAMMABLE LIQUIDS".**

7) **Smoking.** Smoking shall be prohibited and **"No Smoking or Open Flame"** signs provided within 25 feet of outdoor storage, dispensing or open use areas.

8) **NYSDEC Required Labels (can be painted directly on tank, metal sign not needed for the following):**

a) **Color code fill port** in accordance with API and NYSDEC for products stored (see attached color sheet from NYSDEC).

b) **Label tank with unique tank identification** number as listed on the NYSDEC Petroleum Bulk Storage Registration on the tank and at the gauge:

c) **Label Tanks with Design capacity and Working Capacity** on the tank and at the tank gauge:

"Design Capacity _____ Gallons", "Working Capacity _____ Gallons"

d) **Label Tanks with products stored.** Be sure that Diesel fuel is labeled as either "High Sulfur" or "Ultra Low Sulfur", etc. as appropriate.

9) Underground Fuel Storage Tanks.

For Underground Tanks Installed After 1986

1) The tank must bear a permanent stencil, label or plate containing the following information:

- (i) manufacturer's statement that, "This tank conforms with 6NYCRR Part 614";
- (ii) the standard of design by which the tank was manufactured
- (iii) the petroleum products and percentages of volume of petroleum additives which may be stored permanently and compatibly within the tank or reference to a list available from the manufacturer which identifies products compatible with all tank materials;
- (iv) the year in which the tank was manufactured;
- (v) a unique identification number;
- (vi) the dimensions, design and working capacity and model number of tank; and
- (vii) the name of manufacturer.

2) A second label which shows all of the information required above and which also shows the date of installation must be conspicuously displayed and permanently affixed at the fill port. It must be readily visible to the carrier and may be imbedded in concrete, welded to the fill port, or otherwise permanently affixed.

Appendix W

**Maintenance Records for Oil-Filled
Operational Equipment**

Appendix W
Maintenance Records for Oil-
Filled Operational Equipment
Metalico Aluminum Recovery, Inc.
Facility No. 7102372

Include any records of maintenance, testing, inspection, etc. of oil-filled operational equipment at the Facility in this appendix.

Appendix X
NYSDEC SPDES Discharge Permit



NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
State Pollutant Discharge Elimination System (SPDES)
DISCHARGE PERMIT
Special Conditions

First3.99

Industrial Code: 5093
Discharge Class (CL): 01
Toxic Class (TX): T
Major Drainage Basin: 07
Sub Drainage Basin: 02
Water Index Number: P-154-3
Compact Area:

SPDES Number: NY- 026 1947
DEC Number: 7-3126-00277/00002
Effective Date (EDP): 10/01/2006
Expiration Date (ExDP): 9/30/2011
Modification Dates:(EDPM) 5/1/07

This SPDES permit is issued in compliance with Title 8 of Article 17 of the Environmental Conservation Law of New York State and in compliance with the Clean Water Act, as amended, (33 U.S.C. §1251 et.seq.)(hereinafter referred to as "the Act").

PERMITTEE NAME AND ADDRESS

Name: **Metalico Aluminum Recovery, Inc.** Attention: **Jon Marantz**
Street: **6223 Thompson Road**
City: **Syracuse** State: **NY** Zip Code: **13206**
is authorized to discharge from the facility described below:

FACILITY NAME AND ADDRESS

Name: **Metalico Aluminum Recovery, Inc.**
Location (C,T,V): **(T) DeWitt** County: **Onondaga**
Facility Address: **6223 Thompson Road**
City: **Syracuse** State: **NY** Zip Code: **13206**
NYTM -E: NYTM -N:
From Outfall No.: **001** at Latitude: **43 ° 04 ' 23 "** & Longitude: **76 ° 05 ' 53 "**
into receiving waters known as: **South Branch Ley Creek** Class: **C**
and; (list other Outfalls, Receiving Waters & Water Classifications)

002 to South Branch Ley Creek, Class C

in accordance with: effluent limitations; monitoring and reporting requirements; other provisions and conditions set forth this permit; and 6 NYCRR Part 750-1.2(a) and 750-2.

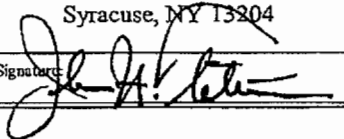
DISCHARGE MONITORING REPORT (DMR) MAILING ADDRESS

Mailing Name: **Metalico Aluminum Recovery, Inc.**
Street: **PO Box 88**
City: **East Syracuse** State: **NY** Zip Code: **13057**
Responsible Official or Agent: **Jon Marantz** Phone: **315-463-9500**

This permit and the authorization to discharge shall expire on midnight of the expiration date shown above and the permittee shall not discharge after the expiration date unless this permit has been renewed, or extended pursuant to law. To be authorized to discharge beyond the expiration date, the permittee shall apply for permit renewal not less than 180 days prior to the expiration date shown above.

DISTRIBUTION:

Bureau of Water Permits
USEPA, Reg 2: Attention Jeff Gratz

Permit Administrator: John Feltman	
Address: 615 Erie Blvd. West Syracuse, NY 13204	
Signature: 	Date: 4/4/07

PERMIT LIMITS, LEVELS AND MONITORING DEFINITIONS

C:\MyFiles\Permit Forms\metalico.wpd

OUTFALL	WASTEWATER TYPE	RECEIVING WATER	EFFECTIVE	EXPIRING		
	This cell describes the type of wastewater authorized for discharge. Examples include process or sanitary wastewater, storm water, non-contact cooling water.	This cell lists classified waters of the state to which the listed outfall discharges.	The date this page starts in effect. (e.g. EDP or EDPM)	The date this page is no longer in effect. (e.g. ExDP)		
PARAMETER	MINIMUM	MAXIMUM	UNITS	SAMPLE FREQ.	SAMPLE TYPE	
e.g. pH, TRC, Temperature, D.O.	The minimum level that must be maintained at all instants in time.	The maximum level that may not be exceeded at any instant in time.	SU, °F, mg/l, etc.			
PARAMETER	EFFLUENT LIMIT	PRACTICAL QUANTITATION LIMIT (PQL)	ACTION LEVEL	UNITS	SAMPLE FREQUENCY	SAMPLE TYPE
	Limit types are defined below in Note 1. The effluent limit is developed based on the more stringent of technology-based standards, required under the Clean Water Act, or New York State water quality standards. The limit has been derived based on existing assumptions and rules. These assumptions include receiving water hardness, pH and temperature; rates of this and other discharges to the receiving stream; etc. If assumptions or rules change the limit may, after due process and modification of this permit, change.	For the purposes of compliance assessment, the analytical method specified in the permit shall be used to monitor the amount of the pollutant in the outfall to this level, provided that the laboratory analyst has complied with the specified quality assurance/quality control procedures in the relevant method. Monitoring results that are lower than this level must be reported, but shall not be used to determine compliance with the calculated limit. This PQL can be neither lowered nor raised without a modification of this permit.	Type I or Type II Action Levels are monitoring requirements, as defined below in Note 2, that trigger additional monitoring and permit review when exceeded.	This can include units of flow, pH, mass, Temperature, concentration. Examples include µg/l, lbs/d, etc.	Examples include Daily, 3/week, weekly, 2/month, monthly, quarterly, 2/yr and yearly.	Examples include grab, 24 hour composite and 3 grab samples collected over a 6 hour period.

Note 1: DAILY DISCHARGE. The discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for the purposes of sampling. For pollutants expressed in units of mass, the 'daily discharge' is calculated as the total mass of the pollutant discharged over the day. For pollutants with limitations expressed in other units of measurement, the 'daily discharge' is calculated as the average measurement of the pollutant over the day.

DAILY MAX. The highest allowable daily discharge. **DAILY MIN.** The lowest allowable daily discharge.

DAILY AVG or 30 DAY ARITHMETIC MEAN (30 day average). The highest allowable average of daily discharges over a calendar month, calculated as the sum of each of the daily discharges measured during a calendar month divided by the number of daily discharges measured during that month.

7 DAY ARITHMETIC MEAN (7 day average). The highest allowable average of daily discharges over a calendar week.

30 DAY GEOMETRIC MEAN. The highest allowable geometric mean of daily discharges over a calendar month, calculated as the antilog of: the sum of the log of each of the daily discharges measured during a calendar month divided by the number of daily discharges measured during that month.

7 DAY GEOMETRIC MEAN. The highest allowable geometric mean of daily discharges over a calendar week.

RANGE. The minimum and maximum instantaneous measurements for the reporting period must remain between the two values shown.

Note 2: ACTION LEVELS. Routine Action Level monitoring results, if not provided for on the Discharge Monitoring Report (DMR) form, shall be appended to the DMR for the period during which the sampling was conducted. If the additional monitoring requirement is triggered as noted below, the permittee shall undertake a short-term, high-intensity monitoring program for the parameter(s). Samples identical to those required for routine monitoring purposes shall be taken on each of at least three consecutive operating and discharging days and analyzed. Results shall be expressed in terms of both concentration and mass, and shall be submitted no later than the end of the third month following the month when the additional monitoring requirement was triggered. Results may be appended to the DMR or transmitted under separate cover to the same address. If levels higher than the Action Levels are confirmed, the permit may be reopened by the Department for consideration of revised Action Levels or effluent limits. The permittee is not authorized to discharge any of the listed parameters at levels which may cause or contribute to a violation of water quality standards. **TYPE I:** The additional monitoring requirement is triggered upon receipt by the permittee of any monitoring results in excess of the stated Action Level. **TYPE II:** The additional monitoring requirement is triggered upon receipt by the permittee of any monitoring results that show the stated action level exceeded for four of six consecutive samples, or for two of six consecutive samples by 20 % or more, or for any one sample by 50 % or more.

FINAL PERMIT LIMITS, LEVELS AND MONITORING

OUTFALL No.	WASTEWATER TYPE	RECEIVING WATER	EFFECTIVE	EXPIRING
001	Stormwater drainage from building, scrap yard, ditch west of building, groundwater infiltration	S. Branch Ley Creek	EDP	EDP+ 5 years

PARAMETER	MINIMUM	MAXIMUM	UNITS	SAMPLE FREQUENCY	SAMPLE TYPE	FOOTNOTES (FN)
pH	6.5	8.5	SU	Monthly	Grab	

PARAMETER	COMPLIANCE LIMIT		MONITORING ACTION LEVEL		UNITS	SAMPLE FREQUENCY	SAMPLE TYPE	FN
	Daily Avg.	Daily Max.	TYPE I	TYPE II				
Flow		Monitor			GPD	Monthly	Instantaneous	
Total Suspended Solids		50			mg/l	Monthly	Grab	
Oil and Grease		15			mg/l	Monthly	Grab	
Aluminum		4.0			mg/l	Monthly	Grab	
Iron		4.0			mg/l	Monthly	Grab	
Zinc		1.0			mg/l	Monthly	Grab	
Copper		0.8			mg/l	Monthly	Grab	
Lead		0.4			mg/l	Monthly	Grab	
PCB 1242		0.3			ug/l	Monthly	Grab	1
PCB 1248		0.3			ug/l	Monthly	Grab	1
PCB 1254		0.3			ug/l	Monthly	Grab	1
PCB 1260		0.3			ug/l	Monthly	Grab	1
Flouride			4.7		mg/l	Quarterly	Grab	
Boron			1.5		mg/l	Quarterly	Grab	
Surfactants			0.5		mg/l	Quarterly	Grab	

FINAL PERMIT LIMITS, LEVELS AND MONITORING

OUTFALL No.	WASTEWATER TYPE	RECEIVING WATER	EFFECTIVE	EXPIRING
002	Groundwater, stormwater runoff	S. Branch Ley Creek	EDP	EDP+ 5 years

PARAMETER	MINIMUM	MAXIMUM	UNITS	SAMPLE FREQUENCY	SAMPLE TYPE	FOOTNOTES (FN)
pH	6.5	8.5	SU	Monthly	Grab	

PARAMETER	COMPLIANCE LIMIT		MONITORING ACTION LEVEL		UNITS	SAMPLE FREQUENCY	SAMPLE TYPE	FN
	Daily Avg.	Daily Max.	TYPE I	TYPE II				
Flow		Monitor			GPD	Monthly	Instantaneous	
Temperature		90			°F	Monthly	Grab	3
Total Suspended Solids		50			mg/l	Monthly	Grab	
Oil and Grease		15			mg/l	Monthly	Grab	
Ammonia as NH3		2.4			lb/d	Monthly	Grab	2
Aluminum		4.0			mg/l	Monthly	Grab	
Iron		1.7			mg/l	Monthly	Grab	2
Zinc		1.0			mg/l	Monthly	Grab	
Copper		0.1			lb/d	Monthly	Grab	2
Lead		0.4			mg/l	Monthly	Grab	
Cadmium		0.0035			lb/d	Monthly	Grab	2
Surfactants		0.07			lb/d	Monthly	Grab	2
PCB 1242		0.3			ug/l	Monthly	Grab	1
PCB 1248		0.3			ug/l	Monthly	Grab	1
PCB 1254		0.3			ug/l	Monthly	Grab	1
PCB 1260		0.3			ug/l	Monthly	Grab	1
Phosphorus, Total			1.0		mg/l	Quarterly	Grab	
Flouride			2.6		mg/l	Quarterly	Grab	
Boron			1.0		mg/l	Quarterly	Grab	

Footnotes:

1. PCBs Issue:
 - a. The permittee must monitor this discharge for PCBs using USEPA laboratory method 608. The laboratory must make all reasonable attempts to achieve an method detection limit (MDL) of 0.065 µg/l or less per Aroclor. Monitoring requirements may be modified in the future if the Department approves a method different from 608.
 - b. Non-detect at the MDL is the discharge goal. The permittee shall report all values above the method detection limit of 0.065 µg/l per Aroclor. If the level of any Aroclor is above the MDL, the permittee must evaluate the treatment system and identify the cause of the detectable level of PCBs in the discharge. Following three consecutive months that include analytical results above the MDL (0.065 µg/l), the permittee shall prepare an approvable report identifying the measures undertaken to eliminate the detections and proposed additional steps to be taken to eliminate the recurrence of such detections. This report shall be submitted to the Department within 28 days following receipt of sampling results from the third monitoring period.
 - c. If the department determines that effluent monitoring results above the MDL (0.065 µg/l) can be prevented by implementation of additional measures as proposed by the permittee, the permittee shall implement such additional measures.
 - d. The treatment technology for this discharge constitutes the maximum feasible treatment technology for treatment of PCBs. As treatment technology improvements become available, the permittee shall, at its own initiative or the department's request, review the available technology and submit for department approval, plans to improve the treatment technology and/or Best Management Practices employed to remove maximum feasible amount of PCBs from the wastewater discharge.
 - e. This limit is a phased Total Maximum Daily Loading limit, prepared in accordance with 6 NYCRR 702.16(b).
 - f. Monitoring and reporting of PCBs identified in the above Items "a" and "b" at Outfalls 001 and 002 will be strictly enforced.
 - g. Previous owners of the site were required, under Order on Consent (#R7-0996-96-08, issued on March 13, 1998) to conduct a sewer investigation plan for PCBs, including PCB discharges from Outfall 001. The Order further required installation of a PCB treatment system. This system was never constructed. Should effluent monitoring show that PCB levels exceed the MDL for three consecutive months, than the permittee shall implement a PCB Pollutant Minimization Plan as detailed on page 6 of 10 of this permit.
2. Samples for these parameters shall be taken during dry weather flow.
3. Location of temperature measurement should be at 700 feet downstream of outfall 002 and 275 feet upstream of Ley Creek.

SPECIAL CONDITIONS - INDUSTRIAL POLLUTANT MINIMIZATION PROGRAM POLYCHLORINATED BIPHENYLS (PCBs)

1. The permittee shall develop, maintain, and implement a Pollutant Minimization Program (PMP). The PMP is required because the calculated water quality based effluent limit (WQBEL) of 0.001 nanograms/liter (ng/L) for Total PCBs is below the permit limit (quantification level) of 300 ng/L per Aroclor using EPA Method 608. The goal of this PMP will be to meet the calculated WQBEL. These requirements will become effective upon the permittee's receipt of three consecutive detections above the Method Detection Level (MDL) of 0.065 µg/l. **WITHIN 6 MONTHS OF THREE CONSECUTIVE DETECTIONS ABOVE THE MDL**, the completed, approvable PMP plan shall be submitted to the Regional Water Engineer and to the Bureau of Water Permits for approval. Subsequent modifications or renewal of this permit does not reset or revise this deadline unless a new deadline is set explicitly by such a permit modification or renewal.
2. The PMP plan shall be documented in narrative form and shall include any necessary plot plans, drawings, or maps. Other documents already prepared for the facility, such as a Best Management Practices Plan, may be used as part of the plan and may be incorporated by reference. As a minimum, the PMP plan shall include:
 - A. An on-going potential source identification, evaluation, and prioritization program.
 - B. Periodic monitoring designed to quantify and, over time, track the reduction of discharges of PCBs. As EPA Method 608 does not determine Total PCBs, monitoring using EPA Method 1668A is also required to determine the level of Total PCBs in the discharge. Minimum required monitoring is as follows: quarterly monitoring of outfall(s) which are known or suspected of containing PCBs; and, semi-annual monitoring of potential PCB sources except during the first year which shall be quarterly. This monitoring shall be performed using EPA Method 1668A and shall be coordinated with routine EPA Method 608 compliance monitoring, if applicable, so that the results can be compared. Additional PCB monitoring must be completed as may be required elsewhere in this permit.
 - C. An approvable schedule for submission of an approvable control strategy for reducing PCB discharges via cost-effective control measures, including but not limited to site treatment or remediation. The schedule for submission of a control strategy will become enforceable under this permit. The control strategy and the schedule for implementation of the control strategy will also become enforceable under this permit.
 - D. An approvable annual report shall be prepared and submitted to the Regional Water Engineer and to the Bureau of Water Permits by February 1 of each year. This report shall summarize all PCB monitoring data (in a format acceptable to the Department - contact the permit writer to obtain an electronic spreadsheet for displaying EPA 1668A data); for treatment systems include a mass balance comparison of influent, effluent, and sludge levels; a list of known or potential PCB sources; all control measures implemented during the previous calendar year; monitoring, investigations, and control measures to be completed during the current calendar year; and document progress toward the goal of achieving the calculated WQBEL.
3. The PMP plan shall be modified whenever: (a) changes at the facility increase the potential for discharge of the PCBs, (b) actual discharges indicate the plan is inadequate, or (c) a letter from the Department identifies inadequacies in the PMP plan.

SCHEDULE OF COMPLIANCE

a) The permittee shall comply with the following schedule:

Action Code	Outfall Number(s)	Compliance Action	Due Date
	001, 002	Permittee shall conduct a short term high intensity monitoring (STHIM) program for benzene, toluene, ethylbenzene, total xylenes, cadmium and chromium. The permittee shall collect 2 grab samples per month at each outfall for three months. The results of these sampling events shall be appended to the permittee's DMR as an attachment. The Department may issue additional permit limits or monitoring requirements as a result of the STHIM program.	EDP + 1 month
	001, 002	Permittee shall submit a Best Management Practices Plan as referenced in pages 8 thru 10 of this permit.	EDP +6 months

The above compliance actions are one time requirements. The permittee shall comply with the above compliance actions to the Department's satisfaction once. When this permit is administratively renewed by NYSDEC letter entitled "SPDES NOTICE/RENEWAL APPLICATION/PERMIT," the permittee is not required to repeat the submission(s) noted above. The above due dates are independent from the effective date of the permit stated in the letter of "SPDES NOTICE/RENEWAL APPLICATION/PERMIT."

- b) The permittee shall submit a written notice of compliance or non-compliance with each of the above schedule dates no later than 14 days following each elapsed date, unless conditions require more immediate notice as prescribed in 6 NYCRR Part 750-1.2(a) and 750-2. All such compliance or non-compliance notification shall be sent to the locations listed under the section of this permit entitled RECORDING, REPORTING AND ADDITIONAL MONITORING REQUIREMENTS. Each notice of non-compliance shall include the following information:
1. A short description of the non-compliance;
 2. A description of any actions taken or proposed by the permittee to comply with the elapsed schedule requirements without further delay and to limit environmental impact associated with the non-compliance;
 3. A description of any factors which tend to explain or mitigate the non-compliance; and
 4. An estimate of the date the permittee will comply with the elapsed schedule requirement and an assessment of the probability that the permittee will meet the next scheduled requirement on time.
- c) The permittee shall submit copies of any document required by the above schedule of compliance to NYSDEC Regional Water Engineer at the location listed under the section of this permit entitled RECORDING, REPORTING AND ADDITIONAL MONITORING REQUIREMENTS and to the Bureau of Water Permits, 625 Broadway, Albany, N.Y. 12233-3505, unless otherwise specified in this permit or in writing by the Department.

SPECIAL CONDITIONS - INDUSTRY BEST MANAGEMENT PRACTICES

1. **General** - The permittee shall develop, maintain, and implement a Best Management Practices (BMP) plan to prevent releases of significant amounts of pollutants to the waters of the State through plant site runoff; spillage and leaks; sludge or waste disposal; and stormwater discharges including, but not limited to, drainage from raw material storage.

The BMP plan shall be documented in narrative form and shall include the 13 minimum BMPs and any necessary plot plans, drawings, or maps. Other documents already prepared for the facility such as a Safety Manual or a Spill Prevention, Control and Countermeasure (SPCC) plan may be used as part of the plan and may be incorporated by reference. A copy of the current BMP plan shall be submitted to the Department as required in item (2.) below and a copy must be maintained at the facility and shall be available to authorized Department representatives upon request.

2. **Compliance Deadlines** - The initial completed BMP plan shall be submitted **WITHIN 6 MONTHS OF EDP** to the Regional Water Engineer. The BMP plan shall be implemented within 6 months of submission, unless a different time frame is approved by the Department. The BMP plan shall be reviewed annually and shall be modified whenever: (a) changes at the facility materially increase the potential for releases of pollutants, (b) actual releases indicate the plan is inadequate, or (c) a letter from the Department identifies inadequacies in the plan. The permittee shall certify in writing, as an attachment to the December Discharge Monitoring Report (DMR), that the annual review has been completed. All BMP plan revisions (with the exception of SWPPPs - see item (4.B.) below) must be submitted to the Regional Water Engineer within 30 days. Note that the permittee is not required to obtain Department approval of the BMP plan (or of any SWPPPs) unless notified otherwise. Subsequent modifications to or renewal of this permit does not reset or revise these deadlines unless a new deadline is set explicitly by such permit modification or renewal.

3. **Facility Review** - The permittee shall review all facility components or systems (including but not limited to material storage areas; in-plant transfer, process, and material handling areas; loading and unloading operations; storm water, erosion, and sediment control measures; process emergency control systems; and sludge and waste disposal areas) where materials or pollutants are used, manufactured, stored or handled to evaluate the potential for the release of pollutants to the waters of the State. In performing such an evaluation, the permittee shall consider such factors as the probability of equipment failure or improper operation, cross-contamination of storm water by process materials, settlement of facility air emissions, the effects of natural phenomena such as freezing temperatures and precipitation, fires, and the facility's history of spills and leaks. The relative toxicity of the pollutant shall be considered in determining the significance of potential releases.

The review shall address all substances present at the facility that are identified in Tables 6-10 of SPDES application Form NY-2C (available at <http://www.dec.state.ny.us/website/dcs/permits/olpermits/form2c.pdf>) or that are required to be monitored for by the SPDES permit.

4. **A. 13 Minimum BMPs** - Whenever the potential for a release of pollutants to State waters is determined to be present, the permittee shall identify BMPs that have been established to prevent or minimize such potential releases. Where BMPs are inadequate or absent, appropriate BMPs shall be established. In selecting appropriate BMPs, the permittee shall consider good industry practices and, where appropriate, structural measures such as secondary containment and erosion/sediment control devices and practices. USEPA guidance for development of stormwater elements of the BMP is available in the September 1992 manual *Storm Water Management for Industrial Activities*, EPA 832-R-92-006 (available from NTIS, 703-487-4650, order # PB 92235969). The BMPs found in the Sectors "M" and "N" of the *New York State Department of Environmental Conservation SPDES General Multi-Sector Permit for Stormwater Discharges Associated with Industrial Activity*, Permit No. GP-0-06-002, effective March 28, 2007 should also be included as necessary. As a minimum, the plan shall include the following BMPs:

- | | | |
|-------------------------------------|---|---------------------------------|
| 1. BMP Pollution Prevention Team | 6. Security | 10. Spill Prevention & Response |
| 2. Reporting of BMP Incidents | 7. Preventive Maintenance | 11. Erosion & Sediment Control |
| 3. Risk Identification & Assessment | 8. Good Housekeeping | 12. Management of Runoff |
| 4. Employee Training | 9. Materials/Waste Handling, Storage, & Compatibility | 13. Street Sweeping |
| 5. Inspections and Records | | |

Note that for some facilities, especially those with few employees, some of the above BMPs may not be applicable. It is acceptable in these cases to indicate "Not Applicable" for the portion(s) of the BMP Plan that do not apply to your facility, along with an explanation.

B. Stormwater Pollution Prevention Plans (SWPPPs) Required for Discharges of Stormwater From Construction Activity to Surface Waters - As part of BMP #11, a SWPPP shall be developed prior to the initiation of any site disturbance of one acre or more of uncontaminated area. Uncontaminated area means soils or groundwater which are free of contamination by any toxic or non-conventional pollutants identified in Tables 6-10 of SPDES application Form NY-2C. Disturbance of any size contaminated area(s) and the resulting discharge of contaminated stormwater is not authorized by this permit unless the discharge is under State or Federal oversight as part of a remedial program or after review by the Regional Water Engineer; nor is such discharge authorized by any SPDES general permit for stormwater discharges. SWPPPs are not required for discharges of stormwater from construction activity to groundwaters.

The SWPPP shall conform to the *New York Standards and Specifications for Erosion and Sediment Control* and *New York State Stormwater Management Design Manual*, unless a variance has been obtained from the Regional Water Engineer, and to any local requirements. The permittee shall submit a copy of the SWPPP and any amendments thereto to the local governing body and any other authorized agency having jurisdiction or regulatory control over the construction activity **at least 30 days prior to soil disturbance**. The SWPPP shall also be submitted to the Regional Water Engineer if contamination, as defined above, is involved and the permittee must obtain a determination of any SPDES permit modifications and/or additional treatment which may be required prior to soil disturbance. Otherwise, the SWPPP shall be submitted to the Department only upon request. When a SWPPP is required, a properly completed *Notice of Intent (NOI)* form shall be submitted (available at www.dec.state.ny.us/website/dow/toolbox/swforms.html) prior to soil disturbance. Note that submission of a NOI is required for informational purposes; the permittee is not eligible for and will not obtain coverage under any SPDES general permit for stormwater discharges, nor are any additional permit fees incurred. SWPPPs must be developed and submitted for subsequent site disturbances in accordance with the above requirements. The permittee is responsible for ensuring that the provisions of each SWPPP is properly implemented.

6. **Facilities with Petroleum and/or Chemical Bulk Storage (PBS and CBS) Areas** - Compliance must be maintained with all applicable regulations including those involving releases, registration, handling and storage (6NYCRR 595-599 and 612-614). Stormwater discharges from handling and storage areas should be eliminated where practical.

A. **Spill Cleanup** - All spilled or leaked substances must be removed from secondary containment systems as soon as practical and for CBS storage areas within 24 hours, unless written authorization is received from the Department. The containment system must be thoroughly cleaned to remove any residual contamination which could cause contamination of stormwater and the resulting discharge of pollutants to waters of the State. Following spill cleanup the affected area must be completely flushed with clean water three times and the water removed after each flushing for proper disposal in an on-site or off-site wastewater treatment plant designed to treat such water and permitted to discharge such wastewater. Alternately, the permittee may test the first batch of stormwater following the spill cleanup to determine discharge acceptability. If the water contains no pollutants it may be discharged. Otherwise it must be disposed of as noted above. See *Discharge Monitoring* below for the list of parameters to be sampled for.

B. **Discharge Operation** - Stormwater must be removed before it compromises the required containment system capacity. Each discharge may only proceed with the prior approval of the permittee staff person responsible for ensuring SPDES permit compliance. Bulk storage secondary containment drainage systems must be locked in a closed position except when the operator is in the process of draining accumulated stormwater. Transfer area secondary containment drainage systems must be locked in a closed position during all transfers and must not be reopened unless the transfer area is clean of contaminants. Stormwater discharges from secondary containment systems should be avoided during periods of precipitation. A logbook shall be maintained on site noting the date, time and personnel supervising each discharge.

C. **Discharge Screening** - Prior to each discharge from a secondary containment system the stormwater must be screened for contamination. All stormwater must be inspected for visible evidence of contamination. Additional screening methods shall be developed by the permittee as part of the overall BMP Plan, e.g. the use of volatile gas meters to detect the presence of gross levels of gasoline or volatile organic compounds. If the screening indicates contamination, the permittee must collect and analyze a representative sample of the stormwater. If the water contains no pollutants it may be discharged. Otherwise it must either be disposed of in an on site or off site wastewater treatment plant designed to treat and permitted to discharge such wastewater or

the Regional Water Engineer can be contacted to determine if it may be discharged without treatment.

D. Discharge Monitoring - Unless the discharge from any bulk storage containment system outlet is identified in the SPDES permit as an outfall with explicit effluent and monitoring requirements, the permittee shall monitor the outlet as follows:

(i) Bulk Storage Secondary Containment Systems:

(a) The volume of each discharge from each outlet must be monitored. Discharge volume may be calculated by measuring the depth of water within the containment area times the wetted area converted to gallons or by other suitable methods. A representative sample shall be collected of the first discharge* following any cleaned up spill or leak. The sample must be analyzed for pH, the substance(s) stored within the containment area and any other pollutants the permittee knows or has reason to believe are present**.

(b) Every fourth discharge* from each outlet must be sampled for pH, the substance(s) stored within the containment area and any other pollutants the permittee knows or has reason to believe are present**.

(ii) Transfer Area Secondary Containment Systems:

The first discharge* following any spill or leak must be sampled for flow, pH, the substance(s) transferred in that area and any other pollutants the permittee knows or has reason to believe are present**.

E. Discharge Reporting - Any results of monitoring required above, excluding screening data, must be submitted to the Department by appending them to the corresponding DMR. Failure to perform the required discharge monitoring and reporting shall constitute a violation of the terms of the SPDES permit.

F. Prohibited Discharges - In all cases, any discharge which contains a visible sheen, foam, or odor, or may cause or contribute to a violation of water quality is prohibited. The following discharges are prohibited unless specifically authorized elsewhere in this SPDES permit: spills or leaks, tank bottoms, maintenance wastewaters, wash waters where detergents or other chemicals have been used, tank hydrotest and ballast waters, contained fire fighting runoff, fire training water contaminated by contact with pollutants or containing foam or fire retardant additives, and unnecessary discharges of water or wastewater into secondary containment systems.

* Discharge includes stormwater discharges and snow and ice removal. If applicable, a representative sample of snow and/or ice should be collected and allowed to melt prior to assessment.

** If the stored substance is gasoline or aviation fuel then sample for oil & grease, benzene, ethylbenzene, naphthalene, toluene and total xylenes (EPA method 602). If the stored substance is kerosene, diesel fuel, fuel oil, or lubricating oil then sample for oil & grease and polynuclear aromatic hydrocarbons (EPA method 610). If the substance(s) are listed in Tables 6-8 of SPDES application form NY-2C then sampling is required. If the substance(s) are listed in NY-2C Tables 9-10 sampling for appropriate indicator parameters may be required, e.g. BOD5 or toxicity testing. Contact the facility inspector for further guidance. In all cases flow and pH monitoring is required.

Effective Date of Permit: _____

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DISCHARGE NOTIFICATION REQUIREMENTS

- (a) Except as provided in (c), (f) and (g) of these Discharge Notification Act requirements, the permittee shall install and maintain identification signs at all outfalls to surface waters listed in this permit. Such signs shall be installed before initiation of any discharge.
- (b) Subsequent modifications to or renewal of this permit does not reset or revise the deadline set forth in (a) above, unless a new deadline is set explicitly by such permit modification or renewal.
- (c) The Discharge Notification Requirements described herein do not apply to outfalls from which the discharge is composed exclusively of storm water, or discharges to ground water.
- (d) The sign(s) shall be conspicuous, legible and in as close proximity to the point of discharge as is reasonably possible while ensuring the maximum visibility from the surface water and shore. The signs shall be installed in such a manner to pose minimal hazard to navigation, bathing or other water related activities. If the public has access to the water from the land in the vicinity of the outfall, an identical sign shall be posted to be visible from the direction approaching the surface water.

The signs shall have **minimum** dimensions of eighteen inches by twenty four inches (18" x 24") and shall have white letters on a green background and contain the following information:

N.Y.S. PERMITTED DISCHARGE POINT

SPDES PERMIT No.: NY _____

OUTFALL No. : _____

For information about this permitted discharge contact:

Permittee Name: _____

Permittee Contact: _____

Permittee Phone: () - ### - #####

OR:

NYSDEC Division of Water Regional Office Address :

NYSDEC Division of Water Regional Phone: () - ### - #####

- (e) For each discharge required to have a sign in accordance with a), the permittee shall, concurrent with the installation of the sign, provide a repository of copies of the Discharge Monitoring Reports (DMRs), as required by the **RECORDING, REPORTING AND ADDITIONAL MONITORING REQUIREMENTS** page of this permit. This repository shall be open to the public, at a minimum, during normal daytime business hours. The repository may be at the business office repository of the permittee or at an off-premises location of its choice (such location shall be the village, town, city or county clerk's office, the local library or other location as approved by the Department). In accordance with the **RECORDING, REPORTING AND ADDITIONAL MONITORING REQUIREMENTS** page of your permit, each DMR shall be maintained on record for a period of three years.

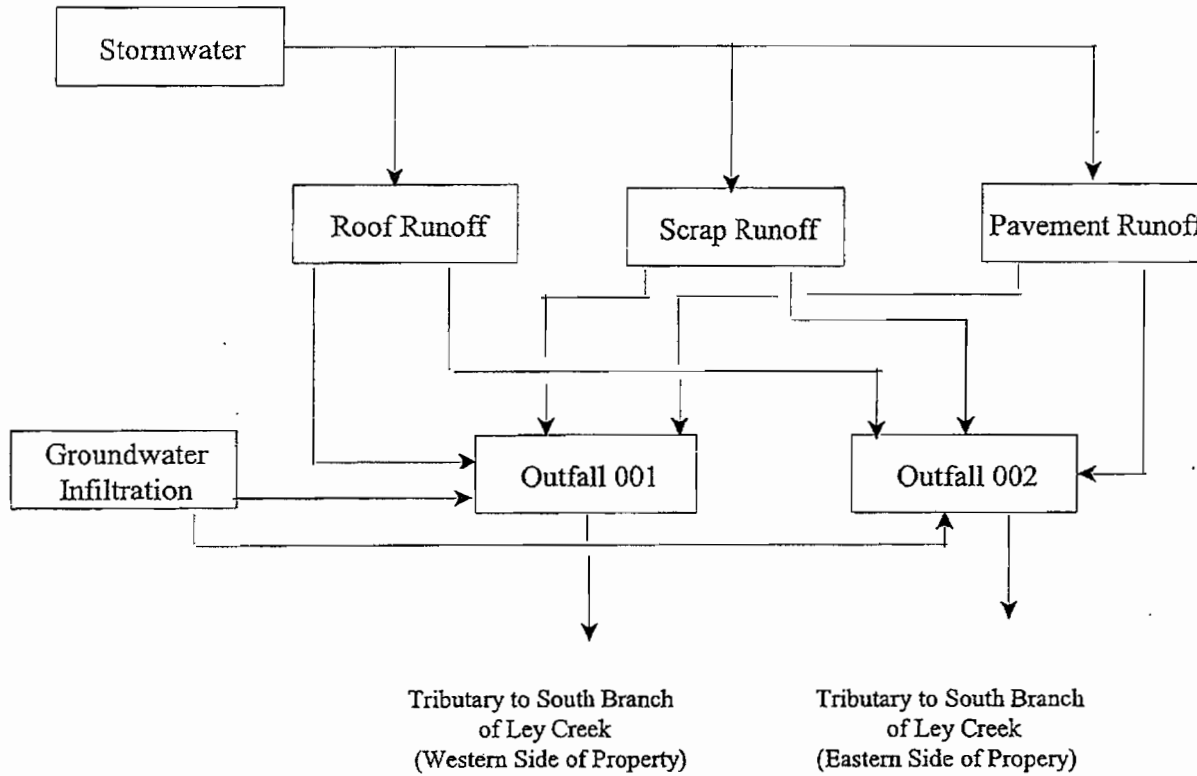
(continued)

- (f) If, upon November 1, 1997, the permittee has installed signs that include the information required by 17-0815-a(2)(a) of the ECL, but do not meet the specifications listed above, the permittee may continue to use the existing signs for a period of up to five years, after which the signs shall comply with the specifications listed above.
- (g) All requirements of the Discharge Notification Act, including public repository requirements, are waived for any outfall meeting any of the following circumstances, provided Department notification is made in accordance with (h):
 - (i) such sign would be inconsistent with any other state or federal statute;
 - (ii) the Discharge Notification Requirements contained herein would require that such sign could only be located in an area that is damaged by ice or flooding due to a one-year storm or storms of less severity;
 - (iii) instances in which the outfall to the receiving water is located on private or government property which is restricted to the public through fencing, patrolling, or other control mechanisms. Property which is posted only, without additional control mechanisms, does not qualify for this provision;
 - (iv) instances where the outfall pipe or channel discharges to another outfall pipe or channel, before discharge to a receiving water; or
 - (v) instances in which the discharge from the outfall is located in the receiving water, two-hundred or more feet from the shoreline of the receiving water.
- (h) If the permittee believes that any outfall which discharges wastewater from the permitted facility meets any of the waiver criteria listed in (g) above, notification (form enclosed) must be made to the Department's Bureau of Water Permits, Central Office, of such fact, and, provided there is no objection by the Department, a sign and DMR repository for the involved outfall(s) are not required. This notification must include the facility's name, address, telephone number, contact, permit number, outfall number(s), and reason why such outfall(s) is waived from the requirements of discharge notification. The Department may evaluate the applicability of a waiver at any time, and take appropriate measures to assure that the ECL and associated regulations are complied with.
- (i) The permittee shall periodically inspect the outfall identification signs in order to ensure that they are maintained, are still visible and contain information that is current and factually correct.

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MONITORING LOCATIONS

The permittee shall take samples and measurements, to comply with the monitoring requirements specified in this permit, at the location(s) specified below:



RECORDING, REPORTING AND ADDITIONAL MONITORING REQUIREMENTS

- a) The permittee shall also refer to 6 NYCRR Part 750-1.2(a) and 750-2 for additional information concerning monitoring and reporting requirements and conditions.
- b) The monitoring information required by this permit shall be summarized, signed and retained for a period of three years from the date of the sampling for subsequent inspection by the Department or its designated agent. Also, monitoring information required by this permit shall be summarized and reported by submitting;
- ☒ (if box is checked) completed and signed Discharge Monitoring Report (DMR) forms for each 1 month reporting period to the locations specified below. Blank forms are available at the Department's Albany office listed below. The first reporting period begins on the effective date of this permit and the reports will be due no later than the 28th day of the month following the end of each reporting period.
- ☐ (if box is checked) an annual report to the Regional Water Engineer at the address specified below. The annual report is due by February 1 and must summarize information for January to December of the previous year in a format acceptable to the Department.
- ☐ (if box is checked) a monthly "Wastewater Facility Operation Report..." (form 92-15-7) to the:
- ☐ Regional Water Engineer and/or ☐ County Health Department or Environmental Control Agency specified below

Send the original (top sheet) of each DMR page to:

Department of Environmental Conservation
Division of Water
Bureau of Watershed Compliance Programs
625 Broadway
Albany, New York 12233-3506

Phone: (518) 402-8177

Send the first copy (second sheet) of each DMR page to:

Department of Environmental Conservation
Regional Water Engineer
615 Erie Blvd. West
Syracuse, New York 13204

Phone: 315-426-7500

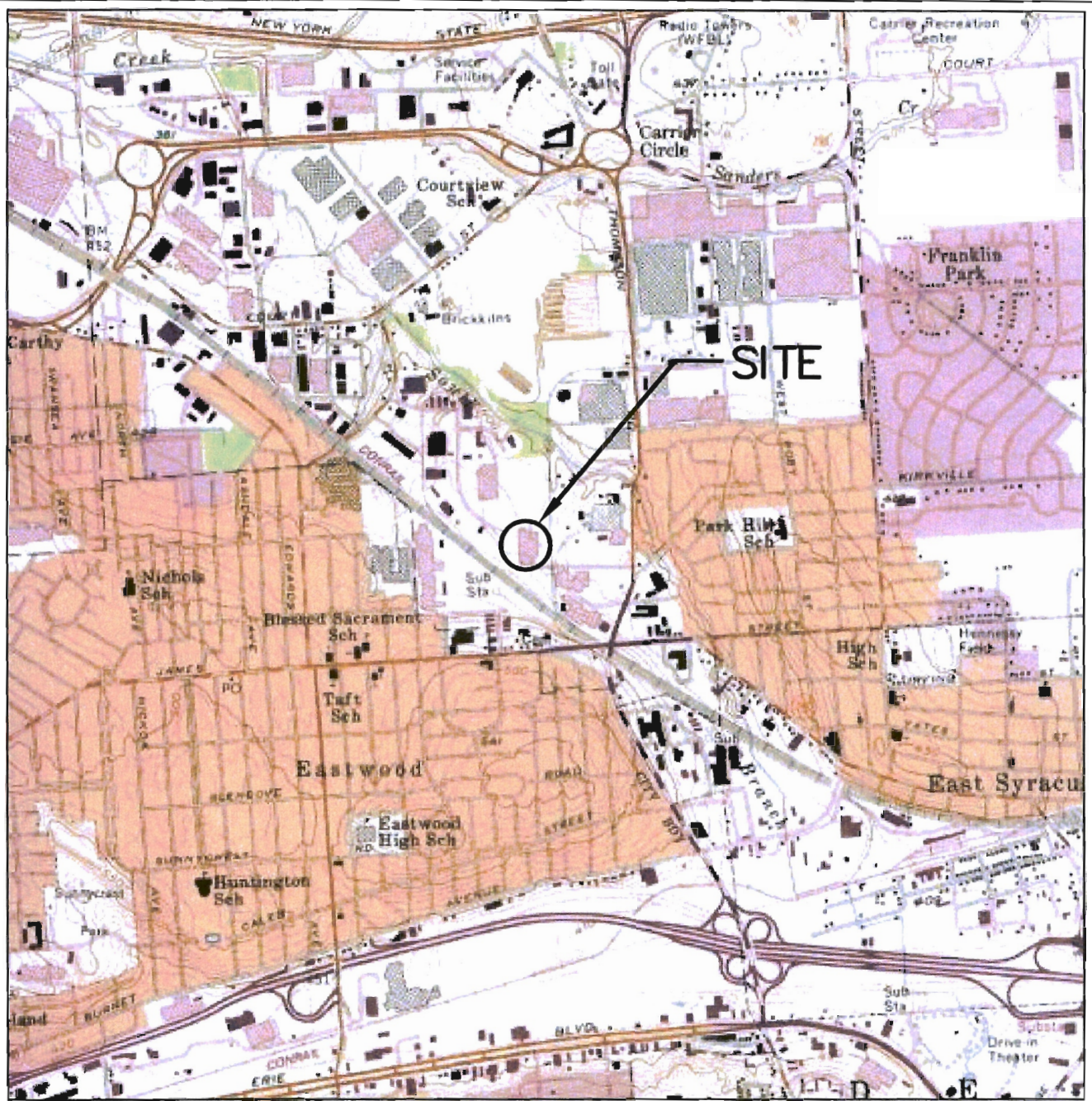
Send an additional copy of each DMR page to:

Onondaga County Health Department
421 Montgomery Street,
Syracuse, New York 13202

- c) Noncompliance with the provisions of this permit shall be reported to the Department as prescribed in 6 NYCRR Part 750-1.2(a) and 750-2.
- d) Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit.
- e) If the permittee monitors any pollutant more frequently than required by the permit, using test procedures approved under 40 CFR Part 136 or as specified in this permit, the results of this monitoring shall be included in the calculations and recording of the data on the Discharge Monitoring Reports.
- f) Calculation for all limitations which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified in this permit.
- g) Unless otherwise specified, all information recorded on the Discharge Monitoring Report shall be based upon measurements and sampling carried out during the most recently completed reporting period.
- h) Any laboratory test or sample analysis required by this permit for which the State Commissioner of Health issues certificates of approval pursuant to section five hundred two of the Public Health Law shall be conducted by a laboratory which has been issued a certificate of approval. Inquiries regarding laboratory certification should be sent to the Environmental Laboratory Accreditation Program, New York State Health Department Center for Laboratories and Research, Division of Environmental Sciences, The Nelson A. Rockefeller Empire State Plaza, Albany, New York 12201.

Figures

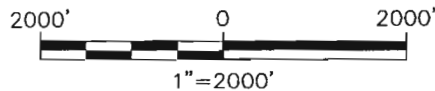
Figure 1
Site Location Map



SOURCE: SYRACUSE EAST, NEW YORK U.S.G.S. QUADRANGLE MAP, DATE 1978.



QUADRANGLE LOCATION



N



TRUE OR CALLED
NORTH

Barton
Loguidice, P.C.

METALICO ALUMINIUM RECOVERY, INC.
FACILITY NO. 7102372

SITE LOCATION MAP

Figure Number
1

Project Number
1206.001

Date
AUGUST, 2008

Scale
AS SHOWN

EAST SYRACUSE

ONONDAGA COUNTY, NEW YORK

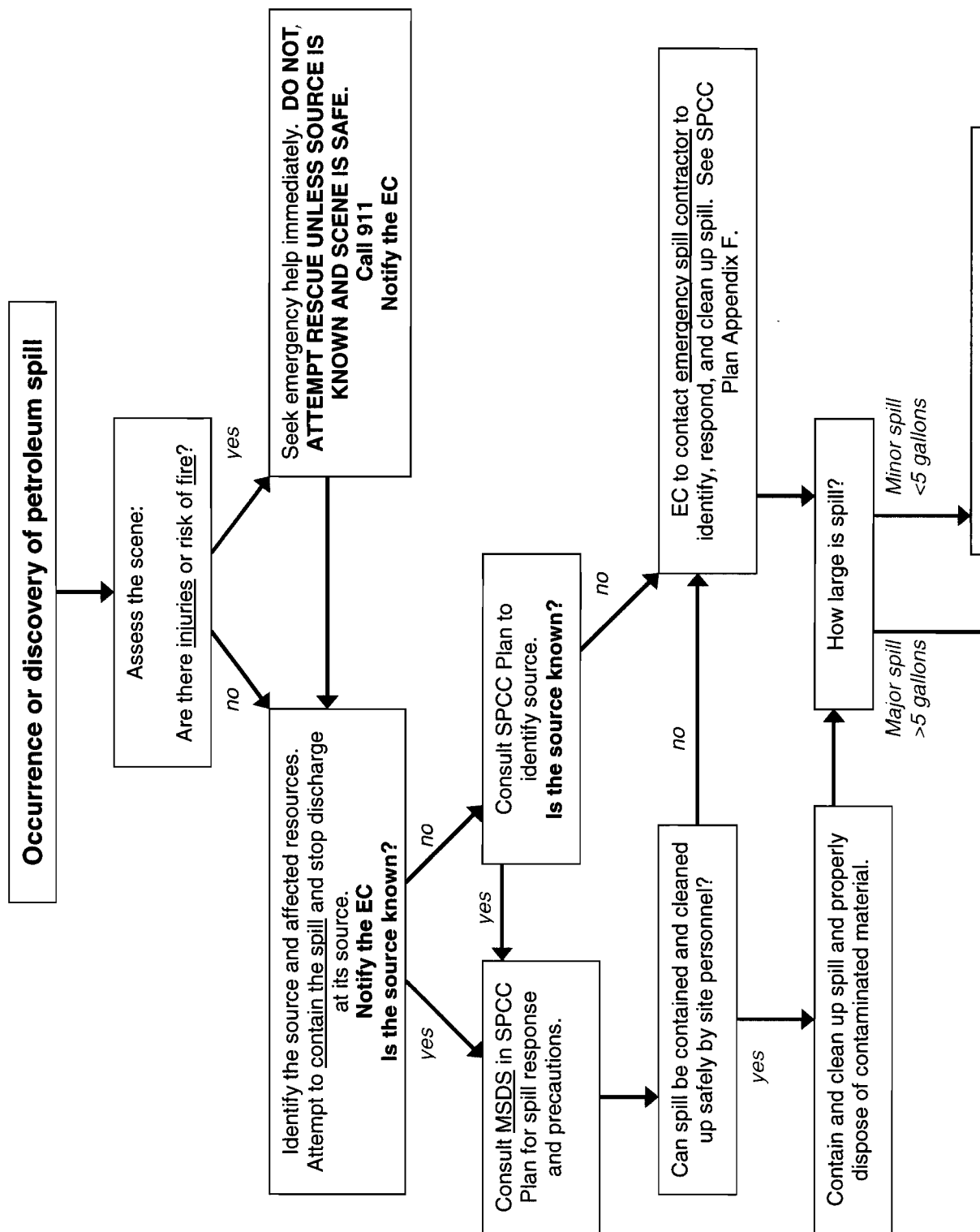
Figure 2
SPCC/BMP Site Plan

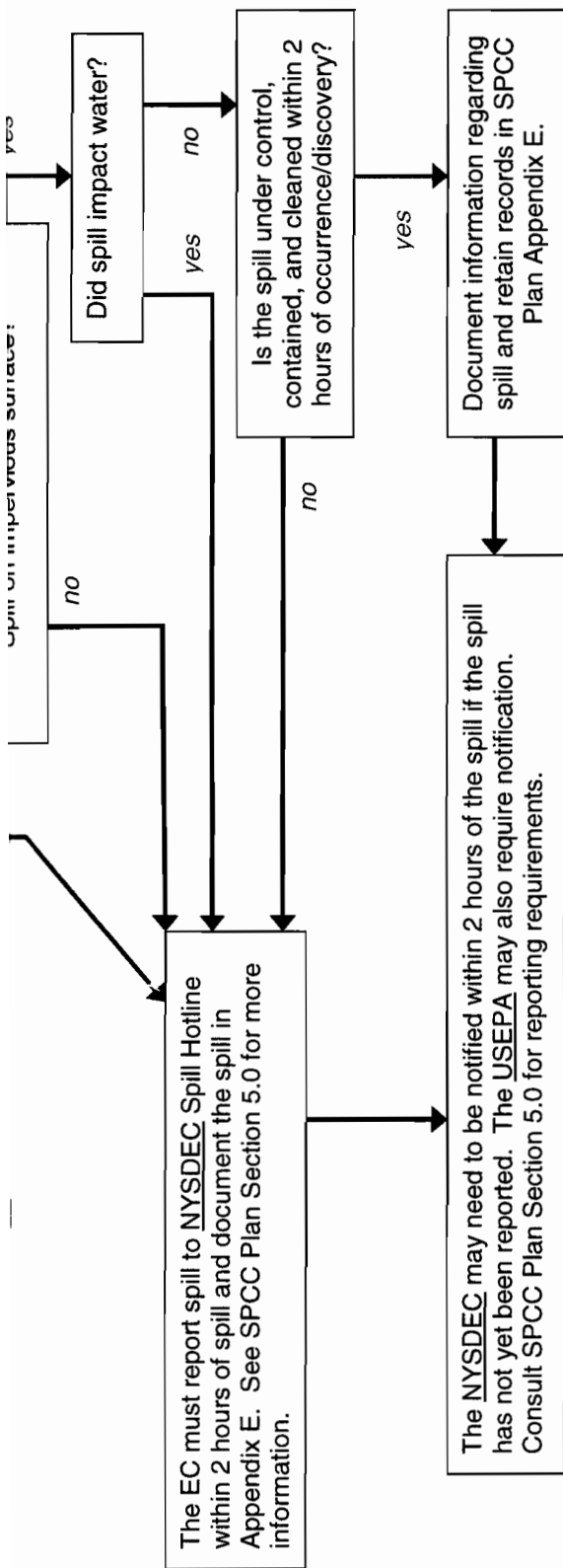
Figure 3
Spill Response Decision Tree

Metalico Aluminum Recovery, Inc.
Facility No. 7102372

SPILL RESPONSE PROCEDURE DECISION TREE

Consult SPCC Plan Section 4.0 "Spill Response Procedures" for more detailed instructions





Emergency Coordinator

Dennis Flanagan (315) 463-9500 ext. 208 (office)
(315) 372-1087 (cell)

Alternate ECs

Jim Brady (315) 463-9500 ext. 205 (office)
(315) 383-9819 (cell)

Bill Eibert (315) 463-9500 ext. 213 (office)
(315) 374-1507 (cell)

Burt Coleman (315) 463-9500 ext. 217 (office)
(315) 480-1918 (cell)

NYSDEC Spill Hotline

(800) 457-7362

USEPA National Response Center

(800) 424-8802

U.S. Coast Guard, Duty Officer
400 Seventh Street
Washington, DC 20590

Emergency Services

911

A complete copy of the SPCC Plan is located in the EC's office

COPY, LAMINATE AND POST IN ALL OIL STORAGE AND HANDLING AREAS AT THE FACILITY